

IN THE
United States Court of Appeals
FOR THE ELEVENTH CIRCUIT

IRA KLEIMAN, as the Personal Representative
of the ESTATE OF DAVID KLEIMAN,
Plaintiff-Appellant,
W&K INFO DEFENSE RESEARCH, LLC,
Plaintiff,
—v.—

CRAIG WRIGHT,
Defendant-Appellee.

ON APPEAL FROM THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

SUPPLEMENTAL APPENDIX
VOLUME XI OF XVII

ANDREW S. BRENNER
LASELVE ELIJAH HARRISON
ALEXANDER J. HOLTZMAN
SAMANTHA MARIE LICATA
MAXWELL PRITT
STEPHEN NEAL ZACK
BOIES SCHILLER FLEXNER LLP
100 SE Second Street, Suite 2800
Miami, Florida 33131
(305) 539-8400

DEVIN FREEDMAN
FREEDMAN NORMAND
FRIEDLAND, LLP
1 SE Third Avenue, Suite 1240
Miami, Florida 33131
(305) 306-9211

—and—

KYLE ROCHE
STEPHEN LAGOS
ROCHE FREEDMAN LLC
99 Park Avenue, Suite 1910
New York, New York 10016
(646) 350-0527
jcyrulnik@rcfllp.com
Attorneys for Plaintiff-Appellant

ANDRÉS RIVERO
JORGE A. MESTRE
AMANDA MCGOVERN
ALAN H. ROLNICK
ROBERT J. KUNTZ JR.
ALLISON HENRY
RIVERO MESTRE LLP
2525 Ponce de León Boulevard, Suite 1000
Miami, Florida 33134
Telephone: (305) 445-2500
Facsimile: (305) 445-2505
arivero@riveromestre.com
jmestre@riveromesre.com
amcgovern@riveromestre.com
arolnick@riveromestre.com
rkuntz@riveromestre.com
ahenry@riveromestre.com

MICHAEL A. FERNÁNDEZ
AMY C. BROWN
RIVERO MESTRE LLP
565 Fifth Avenue, 7th Floor
New York, New York 10017
Telephone: (212) 880-9451
Facsimile: (212) 504-9522
mfernandez@riveromestre.com
abrown@riveromestre.com
Attorneys for Defendant-Appellee

TABLE OF CONTENTS

TAB NO.	DESCRIPTION
210	Plaintiffs' Motion to Compel Defendant to Comply with this Court's Orders Directing Him to Produce a List of the Bitcoins He Held as of December 31, 2013
429	Order Granting in Part and Denying in Part Plaintiffs' Corrected Motion for Attorneys' Fees (DE 346), filed March 17, 2020
618	Joint Proposed Jury Instructions, filed September 29, 2020
802-1	Exhibit A to Defendant's Opposition to Motion for a New Trial (DE 861) — Final Jury Instruction Objections
829	Email from Craig S. Wright to Dave Kleiman, dated March 12, 2008
837	Trial Transcript Day 1, dated November 1, 2021
838	Trial Transcript Day 2, dated November 2, 2021
839	Trial Transcript Day 3, dated November 3, 2021
840	Trial Transcript Day 4, dated November 4, 2021
841	Trial Transcript Day 5, dated November 5, 2021
842	Trial Transcript Day 6, dated November 8, 2021
843	Trial Transcript Day 7, dated November 9, 2021
845	Trial Transcript Day 9, dated November 15, 2021

TAB NO.	DESCRIPTION
846	Trial Transcript Day 10, dated November 16, 2021
847	Trial Transcript Day 11, dated November 17, 2021
848	Trial Transcript Day 12, dated November 18, 2021
848	Trial Transcript Day 12, dated November 18, 2021
850	Trial Transcript Day 14, dated November 22, 2021
851	Trial Transcript Day 15, dated November 23, 2021
861	Law360 Article entitled, “No Proof Bitcoin ‘Inventor’ Owed Friend, Juror Tells Law360”
877	Joint Notice and Request for Judicial Ruling on Proposed Redactions to Admitted Trial Exhibits, filed January 31, 2022

845

1 (Plaintiffs' Exhibit 727 received into evidence.)

2 MR. FREEDMAN: Can you go back to Page 4, please.

3 BY MR. FREEDMAN:

4 Q. So, Dr. Wright, April 16th, 2014, Ira Kleiman emails you.

5 "Dear Craig -- "Hi, Craig. I just received an email from the
6 Australian Taxation Office and they want me to answer some
7 questions regarding W&K. I'm attaching the document they sent
8 me. How would you like me to handle this?"

9 Do you see that?

10 A. Yes. At that time, I was rather naive. I didn't think
11 "clocktime2020" -- which strangely enough seems to be when my
12 trust is supposed to vest. I really didn't think that -- "The
13 ATO had reached out to you on that email address." How would
14 they know that? What I didn't realize at the time was they
15 reached out to Dave Kleiman and someone pretended to be for a
16 while.

17 MR. FREEDMAN: Ms. Vela, can you please bring up P862,
18 and this is in evidence.

19 And let's go to Page 44.

20 Oh, you know what? Hold on. Let's go back to Page 1.

21 BY MR. FREEDMAN:

22 Q. Dr. Wright, this document is in evidence, it is from Andrew
23 Miller of the Australian Taxation Office. It is sent to
24 clocktime2020@gmail.com and it is addressed to the executor for
25 the estate of Dave Kleiman. Do you see that?

1 A. Yes, I do. Because I'd like to -- I mean, that really sort
2 of was something that got me thinking during this. How on
3 earth would a random Gmail account, one of hundreds that man
4 runs, under hundreds of names, be picked up by a random
5 auditor? Not on websites, not on social media. How would, out
6 of the billions of emails, someone just happened to pick the
7 right one out of the hundreds of accounts, hundreds of names,
8 hundreds of false identities that man runs? Yes, it really
9 interested me.

10 MR. FREEDMAN: Move to strike, Your Honor, as
11 non-responsive.

12 THE COURT: Motion is denied.

13 BY MR. FREEDMAN:

14 Q. Dr. Wright, the Australian Taxation Office actually in this
15 email says exactly how they got the right email address and the
16 right contact, don't they? Your details have been provided to
17 us by a former colleague of Mr. Kleiman.

18 A. Yes. On Dave's email.

19 Q. Does it say: "On Dave's email" in the letter?

20 MS. MCGOVERN: Objection, Your Honor.

21 THE COURT: The basis?

22 MS. MCGOVERN: Document speaks for itself.

23 THE COURT: Sustained.

24 MR. FREEDMAN: Ms. Vela, can you bring us to Page 44.
25

1 BY MR. FREEDMAN:

2 Q. Official stamp of the Australian Taxation Office in the top
3 right corner of the attachment, Dr. Wright?

4 A. Never seen the document.

5 Q. That's because it's addressed to the executor of the estate
6 of Dave Kleiman, care of Ira Kleiman, right?

7 A. Don't recognize it. Sorry.

8 MR. FREEDMAN: Ms. Vela, could you highlight that for
9 us, please?

10 Thank you.

11 BY MR. FREEDMAN:

12 Q. And they say to the executor of the estate of Dave Kleiman:
13 "We request that you assist our inquiries by answering some
14 questions below. A colleague of the late Mr. Kleiman has
15 provided us with your details and advised that you are the
16 executor of Mr. Kleiman's estate."

17 Do you see that?

18 A. No. Don't recognize the document. Sorry.

19 Q. I just asked if you saw it, Dr. Wright.

20 A. I see a document I don't recognize.

21 Q. "Legal action has been taken in Australia."

22 Do you see that?

23 A. I see a document I don't recognize.

24 Q. "Against a company associated with Mr. Kleiman, W&K Info
25 Defense Research. W&K. We have attached the documents

1 pertaining to W&K and they are provided to you in your capacity
2 as the executor for the estate of the director."

3 Do you see that?

4 A. Don't recognize the document, but I see it.

5 Q. "Can you please provide the following information:

6 Question 1, are you aware of the legal actions taken by
7 Dr. Craig Wright against W&K?"

8 Do you see that?

9 A. I see a document I don't recognize, yes.

10 MR. FREEDMAN: Ms. Vela, can you leave this one on the
11 side. Let's push it to the left, and let's bring up, please,
12 P727, which I do not -- I don't know if it's in evidence. So
13 let's take it down from publishing it until we find that out,
14 please.

15 Is P727 in evidence? It is in evidence.

16 MS. MCGOVERN: Yes, it is.

17 MR. FREEDMAN: Okay. Can we put it back up, Ms. Vela,
18 please.

19 And -- sorry. And P862, is that in evidence?

20 Yes? Yes.

21 THE COURT: Hold on one second.

22 MR. FREEDMAN: Can we replace the right side with
23 P862.

24 THE COURT: 862 is in evidence. I think you had asked
25 the question.

1 MR. FREEDMAN: Okay.

2 (Pause in proceedings.)

3 MR. FREEDMAN: On the right -- on the left side is
4 P862?

5 Okay. And on the right side, can we go to Page 2?
6 BY MR. FREEDMAN:

7 Q. Okay. Dr. Wright, do you see your email on April 16th,
8 2014?

9 A. I do.

10 Q. That's the day after --

11 MR. FREEDMAN: Actually, Ms. Vela, let's go to the
12 email before this on the right side first.

13 No. No. One more. One more forward. One more.

14 BY MR. FREEDMAN:

15 Q. Okay. Dr. Wright, April 16th, 2014, the day after Ira
16 Kleiman receives this message from the Australian Taxation
17 Office, he emails you: "Hi, Craig, I just received an email
18 from the Australian Taxation Office and they want me to answer
19 some questions regarding W&K."

20 Do you see that?

21 A. Yes, I do.

22 Q. "I'm attaching the documents they sent me."

23 Do you see that?

24 A. Yes. And I forwarded them to the accountants and others.

25 MR. FREEDMAN: Ms. Vela, let's scroll up now and see

1 Dr. Wright's response.

2 One more time.

3 BY MR. FREEDMAN:

4 Q. You respond: "Hello, Ira. No good deed goes unpunished.
5 I give you permission to talk to and go via the company's
6 Solicitor (lawyer) Andrew Sommer. He is cc'd. I believe you
7 have spoken to Uyen already?"

8 MR. FREEDMAN: Let's see the next page of Dr. Wright's
9 response.

10 BY MR. FREEDMAN:

11 Q. "You will have to state your answers, but as far as I can
12 see" -- and then, Dr. Wright, you lay out proposed responses
13 for each question of the document that you just claim you
14 didn't see. Isn't that true?

15 A. No. I laid out responses based on what my accountant told
16 me. And no, I didn't see the document. It was just forwarded
17 to my accountant. So no, I haven't seen the document.

18 Q. And, in fact, Dr. Wright, let's look at your proposed
19 response to Question 1.

20 Question: "Are you aware of the legal actions taken by
21 Dr. Craig Wright against W&K?"

22 Proposed Response 1: "I told you of them. They all
23 occurred after Dave's death to ensure the completion of the
24 contracts."

25 Do you see that?

1 A. I certainly do. And --

2 Q. That was not true -- wasn't it, Dr. Wright? You never told
3 Ira Kleiman about the lawsuits against W&K?

4 A. I was actually still talking. Sorry, you interrupted me.

5 Q. Oh, please finish your response.

6 A. So -- sorry. I will try and let you speak but please do
7 the same. As I was saying, yes, I saw that. I forwarded this
8 to John Chesher and the audit team and they gave me a series of
9 responses. I forwarded those.

10 Q. Dr. Wright, isn't it true you never told Ira Kleiman about
11 the lawsuits against W&K and you were asking him to lie for you
12 to the Australian Taxation Office?

13 MS. MCGOVERN: Objection, Your Honor.

14 THE COURT: Basis?

15 MS. MCGOVERN: It misstates the evidence in the
16 record, Your Honor.

17 THE COURT: Overruled.

18 THE WITNESS: As stated, the Australian Court had
19 sent, both to Dave's post office box and to his home office and
20 to his emails, which it turns out Mr. Kleiman had access to,
21 all of the required forms for the starting of this case. So
22 being that he received them, that Patrick Paige and others
23 received them, they could have easily just responded to the
24 Court if they didn't agree.

25 They could have sent something in. It's asymmetric in

1 that the cost of my responding to the Court would be far larger
2 than him just sending an email to the Court going: "We
3 disagree." That's all they needed to do.

4 MR. FREEDMAN: Ms. Vela, can you --

5 BY MR. FREEDMAN:

6 Q. Are you done?

7 A. I was going to say one final thing, which is: If he's got
8 the email, if he's using the email, if he has the whole thing,
9 if he's the executor, then it's very simple. He would have, if
10 he read the documents sent to Dave on official letterhead,
11 known all about it.

12 MR. FREEDMAN: Ms. Vela, can you scroll up on the left
13 document.

14 BY MR. FREEDMAN:

15 Q. And, Dr. Wright, on the left-hand side, Question Number 14:
16 "Has the estate been contacted with a request to provide
17 software or intellectual property? If so, has the estate
18 provided these to Dr. Wright?"

19 Proposed Response 14: "We have the software. W&K is not
20 the estate."

21 Do you see that?

22 A. W&K isn't the estate. And W&K maintained all rights to its
23 own software. The little thing that everyone seems to be
24 neglecting here is I never -- when you transfer digital assets,
25 the rights can actually be two places. The transfer of a

1 license doesn't mean that the first person lost it. W&K could
2 have always exploited those rights.

3 Like Coin-Exch., you would have had to work years and years
4 to build something. Just owning a piece of software doesn't
5 give you a business. Just owning intellectual property doesn't
6 give you a business. W&K had the rights and still has the
7 rights to go out there and use that software to build an
8 exchange. They could build something like Coinbase or Kraken.
9 They could have a cryptocurrency exchange.

10 Coinbase, which my software was better than even the
11 unimproved stuff, is now worth about a hundred billion US
12 dollars. If none of that had been interfered with, Coin-Exch.
13 would be worth even more. But -- and this is the big but --
14 you have to work your damn ass off when you have a founding
15 company that is new, that is trying to get customers. Software
16 doesn't make money. Customers do.

17 So the difference is W&K could do that, but someone has to
18 pull his finger out of his ass and work hard.

19 MR. FREEDMAN: Thank you, Ms. Vela.

20 BY MR. FREEDMAN:

21 Q. Dr. Wright, after you provided proposed responses for Ira
22 to send to the Australian Taxation Office, you also put him in
23 touch with your lawyer to help him draft those responses,
24 correct?

25 A. Yes. That's probably the stupidest thing I've ever done.

1 I've learnt my mistake. Never ever waive privilege and give
2 complete access to anyone that you have not met and don't know
3 to your lawyers. And basically it's pulling up the kilt and
4 showing it all and it's a really, really dumb thing to do. So
5 advice to everyone: Never do my stupid mistake. Learn from
6 me. Stupid mistake.

7 MR. FREEDMAN: Ms. Vela, can you put P156 on the
8 screen. Let's go to Page 14.

9 This document is in evidence, so can we please
10 publish.

11 BY MR. FREEDMAN:

12 Q. And, Dr. Wright, this is the email from you offering to
13 have Andrew Sommer, your lawyer, draft the responses for the
14 Australian Taxation Office. "Andrew can help you -- can help
15 if you want to answer the questions."

16 A. That is correct. As I said, Andrew is one of the top
17 lawyers in Australia. The amount he charges is phenomenally
18 large, but he is -- when it comes to tax law and accounting
19 law, he is remarkable. I'll say that even now. The man can
20 quote tax law. And I don't know if you have ever seen how much
21 damn tax law there is. It is -- I'm impressed even now with
22 this guy.

23 So yes, he doesn't lie. When I said this, and Andrew could
24 answer everything, I gave someone who would give the best, most
25 honest whole truth that anyone could ever imagine. And yes, I

1 allowed that.

2 MR. FREEDMAN: Ms. Vela, can you please put P240 on
3 the screen.

4 Can you go to the next page?

5 BY MR. FREEDMAN:

6 Q. Andrew Sommer, the top lawyer in Australia who doesn't lie,
7 fired you for forging documents to the Australian Taxation
8 Office, didn't he?

9 MS. MCGOVERN: Objection, Your Honor. Asked and
10 answered in prior examination.

11 THE COURT: Overruled.

12 THE WITNESS: Again, a misstatement of what happened.
13 There was information that came out of the tax office, as I
14 said before, that basically was set up to make it look like
15 emails had been altered by me. And no, it wasn't sent to me.
16 I'd already resigned from the companies because the tax office
17 targeted me all the time. That's why I left.

18 MR. FREEDMAN: Ms. Vela, let's go back to P156,
19 please. And let's go to Page 14.

20 BY MR. FREEDMAN:

21 Q. Dr. Wright, this was your offer to have Andrew Sommer help
22 draft the emails.

23 MR. FREEDMAN: And, Ms. Vela, take us to Page 13 to
24 see Ira's response.

1 BY MR. FREEDMAN:

2 Q. Dr. Wright, Ira responds: "Sure. Andrew can formulate
3 whatever response you're comfortable with and I will send it to
4 them."

5 Do you see that?

6 A. Yes. As I said, Ira, as someone offered a directorship, as
7 a major shareholder in my company, that basically because of
8 his brother inherited a part of my company that I founded,
9 could use Andrew to help him if he wished. He could do
10 whatever he wanted. He could use his own lawyers. But he
11 didn't want to pay money so I allowed him mine.

12 Q. The scheme worked, Dr. Wright, correct?

13 MS. MCGOVERN: Objection, Your Honor.

14 THE COURT: Sustained.

15 Rephrase.

16 MR. FREEDMAN: Okay. Thank you, Ms. Vela.

17 BY MR. FREEDMAN:

18 Q. Dr. Wright, just so you know where I'm going with this, I'd
19 like to now talk about what happened with your companies during
20 the period where you were communicating with Ira in 2014.

21 Okay?

22 A. Yes.

23 Q. So after you obtained judgment from the Australian courts,
24 you then transferred W&K's IP to your various companies,
25 correct?

1 A. No. Mischaracterization once again. The information that
2 I created an Australian company -- venture funded one called
3 Greyfog, that was copied into W&K -- I retained. And that was
4 transferred. The rights to W&K's software and any copies they
5 had were never moved. So sorry. You're mischaracterizing that
6 completely.

7 MR. FREEDMAN: Ms. Vela, can you please bring up P127.
8 Let's go to Page 18.

9 BY MR. FREEDMAN:

10 Q. Dr. Wright, this is a transcript of your meeting with the
11 Australian Taxation Office. And on the left-hand side, we're
12 looking at Andrew Sommer, your lawyer, who doesn't lie,
13 correct?

14 A. No. This is not correct. As I've stated multiple times,
15 none of these were actual transcripts and none of them were
16 accurately transcribed. And all of them remarkably lost the
17 original recorded document, which is really difficult if you're
18 going to transcribe something, but it turns out the document
19 that's recorded is lost. I always found that funny.

20 Q. And I'm looking at line 42.

21 MR. FREEDMAN: Ms. Vela, can you highlight for us 23rd
22 September.

23 BY MR. FREEDMAN:

24 Q. "Intellectual property that has been acquired by Dr. Wright
25 from W&K Info Defense is on supply to the Wright Family Trust

1 and then broken up and transferred to other group entities.
2 Hotwire, Coin-Exch.," and so on.

3 Do you see that?

4 A. Yeah, and my explanation still stands.

5 MR. FREEDMAN: Thank you, Ms. Vela.

6 BY MR. FREEDMAN:

7 Q. Around this time, Dr. Wright, your companies were seeking
8 investors, correct?

9 A. That's -- well, basically around that time is wrong.
10 Investors is ongoing. So I said with Greyfog, which was back
11 in -- I think it was July or August of 2009, that was where we
12 started with angel funding and went up to round B.

13 I don't know if you know what the differences are in these
14 things but angel funding is something where you're really,
15 really small in seed which was when I first started Bitcoin.
16 And round A is like the first real vulture capitalist --
17 sorry -- venture capitalist. And then round B is if you meet
18 some targets and you get further funding. So any start-up
19 company continuously does this.

20 Q. And in January 2014, you emailed someone named Stefan
21 Matthews a Hotwire investor pack, correct?

22 A. I certainly did, yes.

23 MR. FREEDMAN: Ms. Vela, can you please bring up P113.

24 BY MR. FREEDMAN:

25 Q. And, Dr. Wright, do you recognize this as the email we've

1 just mentioned?

2 A. I do.

3 MR. FREEDMAN: Your Honor, Plaintiffs offer P113 into
4 evidence.

5 MS. MCGOVERN: No objection, Your Honor.

6 THE COURT: Without objection, admitted into evidence.
7 (Plaintiffs' Exhibit 113 received into evidence.)

8 MR. FREEDMAN: Thank you, Ms. Vela.

9 BY MR. FREEDMAN:

10 Q. Dr. Wright, during this period, your companies did work to
11 determine the value of the software that they obtained from
12 W&K; isn't that correct?

13 A. That's not actually characterizing it correctly. We had
14 software valuations for tax purposes. The valuation is then
15 based on the number of lines of code, et cetera, to do a
16 replacement. So that's a separate issue.

17 But for tax purposes, the auditors at KPMG required that we
18 had an external evaluation of the input value because some of
19 the people like myself who were founders had never charged the
20 company for what we did. And thus, we needed a proper
21 valuation done.

22 Q. You were seeking to determine the value of software from
23 W&K, correct?

24 A. No. We're talking about the replacement value of a --
25 intellectual property that we had so that we could actually

1 look at how much this would take to redo it from scratch.

2 Q. That you had from W&K, correct?

3 A. No. That is not correct. This is the software that we had
4 developed from 2009 on. None of this came from W&K. As I
5 stated, the information from Greyfog, which was an Australian
6 company, was initially transferred with rights to W&K.

7 W&K never gave the enhanced product back. We kept working
8 in Australia and that is what we're talking about.

9 What you're confusing is the purchased software. I made a
10 deal with a bunch of bankers from Saudi countries. Basically,
11 Bitcoin -- a lot of people say it's like gold. It's not really
12 like gold but for a simple explanation, it's a commodity. So
13 we needed something. And we took Islamic banking software
14 because there's no interest, and Bitcoin doesn't have interest.
15 There's a fixed amount. You can't have an infinite thing.

16 So a banking software that worked like gold, that worked
17 like old-fashioned banking software was something we needed.

18 We had worked with Temenos, as well. Temenos are one of
19 the Big Four core banking platforms. But they couldn't do what
20 we wanted. They weren't able to do the correct number of
21 digits. There's a hundred million digits in Bitcoin for the
22 Satoshis. Their platform couldn't handle it.

23 So even the guys from Al Baraka, their software couldn't
24 handle it, but we paid for source code and that's why there's
25 so many -- that's why there's 140 years' worth of coding,

1 because the Saudi bank had thousands of staff. And we paid a
2 lot to get that source code so that we could modify it to make
3 a Bitcoin bank. So that's what we're talking about.

4 MR. FREEDMAN: Ms. Vela, can you please put P166 up
5 for the witness and counsel.

6 BY MR. FREEDMAN:

7 Q. Dr. Wright, do you see that is an email from yourself to
8 others, including your wife, talking about W&K?

9 A. It's not talking about W&K. It is the transfer to Andrew
10 McCabe who was one of our commercial lawyers -- sorry --
11 administrators that we appointed. He had asked for a copy of
12 the software document when we put the administrators in before
13 we purchased it back.

14 MR. FREEDMAN: Your Honor, Plaintiffs offer P166 into
15 evidence.

16 MS. MCGOVERN: Objection. The underlying document is
17 hearsay.

18 THE COURT REPORTER: I'm sorry?

19 THE COURT: Yeah. I'm having a hard time hearing you.

20 MS. MCGOVERN: Hearsay.

21 THE COURT: The objection is overruled. It will be
22 admitted into evidence.

23 (Plaintiffs' Exhibit 166 received into evidence.)

24 MR. FREEDMAN: Can we please publish.

25 Ms. Vela, can you zoom in on that email from Dr.

1 Wright, please, at the way top.

2 BY MR. FREEDMAN:

3 Q. Dr. Wright, this is an email from yourself to others
4 including Ms. Watts, your wife, titled "Software Valuations."
5 And the first line opens up with: "More on the valuation of
6 the W&K software is attached."

7 Do you see that?

8 A. Yes. As I said, I just called all of the stuff that I
9 purchased the "W&K" because I had done that with Dave. So
10 we're talking about the valuation of the core banking software.
11 And the other software like the SCADA software that I
12 purchased. So yes.

13 Q. Except you didn't because the next line says: "The other
14 software was obtained at market value"; isn't that right?

15 A. No. Again, you're mischaracterizing me. The other
16 software was obtained at market value. We purchased it. We
17 didn't exchange. But that doesn't mean what we can actually
18 value at. So what you can value different things in accounting
19 terms are all messed up.

20 Accounting law is overly complex, and as a former auditor,
21 it's stupidly bad and makes life difficult for people trying to
22 run businesses. So having differences in cash and accrual on
23 how you value the software, it would be so much easier if it
24 was just that much paid, that much claimed. But it's not.

25

1 Q. Do you see the attachment, Dr. Wright, to the email
2 "Hotwire PE W&K Information Defense Cost Assessment"?

3 A. I don't see the attachment, no.

4 MR. FREEDMAN: Okay. Let's go to Page 47, Ms. Vela,
5 and show Dr. Wright the attachment.

6 BY MR. FREEDMAN:

7 Q. "Hotwire PE W&K Information Defense Cost Assessment
8 Estimation W&K ID."

9 Do you see that?

10 A. Can you scroll through the document for me, please?

11 Q. Not yet. Do you see that?

12 A. I see the first page.

13 MR. FREEDMAN: Thank you.

14 Ms. Vela, bring us to Page 51, please.

15 BY MR. FREEDMAN:

16 Q. Dr. Wright, do you see it says: "Cost evaluation
17 technique. The technique used to evaluate the cost of the W&K
18 ID software pack has been based on the Cocomo II Software
19 Estimation Tool"?

20 A. Cocomo.

21 Q. Cocomo. Thank you.

22 MR. FREEDMAN: Ms. Vela, bring us to Page 53.

23 BY MR. FREEDMAN:

24 Q. And, Dr. Wright, here we see: "Assumptions. The W&K ID
25 software purchase is a one-off license between seller and

1 Hotwire PE. W&K ID software languages and software lines of
2 code" -- is that what SLOC stands for? Software lines of code?
3 A. Yes, it does. And it's very interesting. In the last page
4 that you showed -- I'd forgotten about that -- which was the
5 reference that I put in there to Brooks, is actually the
6 reference I use all through the Bitcoin source code as well.
7 But that's a different -- I reference him all over the place.

8 But yes, we had C# software, which was most of what the
9 Temenos, the Al Baraka software was in, and we had the C++
10 software. And that's the breakdown.

11 So because I was involving Dave, yeah, I called it W&K ID.
12 I'm getting tongue-tied there. And that's where we source --
13 like Dave helped me source the things.

14 MR. FREEDMAN: Ms. Vela, can you zoom in to the
15 Paragraph 5, please.

16 Can you move it to the left-hand side of the screen
17 and bring up on the right P160, which I am fairly certain is in
18 evidence.

19 And, Ms. Vela, can you bring us to Page -- the next
20 page.

21 Oh, sorry, the first page. You're right, Ms. Vela.
22 And zoom in down in the bottom.

23 Yeah.

24 BY MR. FREEDMAN:

25 Q. Dr. Wright, on the right, we're looking at an email from

1 yourself to Ira Kleiman. We've seen this email before dated
2 April 24th, 2014. And on the left, we're looking at the cost
3 estimation. On the left, in the cost estimation, it totals the
4 software lines of code to be 6,080,555. And on the right in
5 your email to Ira Kleiman you say: "Dave Kleiman took two
6 million lines of code that had in 2010, and transformed these
7 into a documented set of over six million lines of code."

8 Does "transform" mean "buy" to you, Dr. Wright?

9 A. Yes. Actually, when you put all that together, this is not
10 one program. We're not talking about a program. And as it
11 says on the document there, the way that it works is W&K to me,
12 international, no GST, like I claimed. And then me, my trust,
13 to the company, GST.

14 But as that document actually reads a little bit above, GST
15 cancels, not that I get \$10 million like he keeps claiming. It
16 cancels. Except the trick that the government had that I
17 didn't think about was they made me pay within three months and
18 then they held my money for 18 months.

19 And I don't know if you know what it's like with cash flow
20 for a starting business. But if you have to pay up front and
21 then beg your money back, beg, and you have to pay accountants
22 and lawyers huge amounts of money to try and get back part of
23 the money you've already paid to someone else, that's a good
24 way of killing a company. If governments don't like what
25 you're doing, that's how they do it.

1 MR. FREEDMAN: Ms. Vela, can you take down the
2 right-hand side.

3 Let's go back to the W&K ID software evaluation.

4 Can you go to Page 56, please?

5 BY MR. FREEDMAN:

6 Q. Conclusion of the software evaluation, Dr. Wright, is that
7 an extremely conservative cost evaluation using industrial
8 standards is assessing minimum costs for the W&K ID software at
9 276,268,599 Australian dollars. And assuming that W&K ID
10 software could be sold at a 10 percent margin, you would be
11 looking at a value for W&K's IP of 303,895,458 Australian
12 dollars; isn't that correct?

13 A. Like I said, as I've been stating, if we could make this
14 into a business, it would have been a great idea. If we ran
15 the exchange, if no one had interfered and tried to liquidate
16 the company so he could get his money early rather than taking
17 \$12 million, if we had built a customer base sort of and a
18 support base where we had clients, it wouldn't be 300 million;
19 it would be a hundred plus billion. Coinbase has nowhere near
20 the technical ability that our software could do. The
21 difference is they have clients. They have licenses.

22 So rather than work with us to try and get a working
23 company that over years could go to an IPO, where 10 years
24 later he'd get a payout that would be large, rather than
25 building that, yes, we had intellectual property that

1 technically -- a little bit older now -- but it could be done
2 up and W&K, if it wanted to try and compete with the existing
3 large players, could try and start from scratch. Instead of in
4 2013, 2014, where there were no competitors and could have
5 built something, now you would have to come into a highly
6 competitive market starting from nowhere. So at that stage,
7 this was a beautiful opportunity.

8 Q. Dr. Wright, you obtained a second opinion regarding the
9 valuation of W&K's software in 2014, didn't you?

10 A. I don't know. My accountants did a number -- I think we
11 actually had three different ones. We usually have three for
12 any of these.

13 MR. FREEDMAN: Ms. Vela, can you please put up P181
14 for just the witness and counsel.

15 BY MR. FREEDMAN:

16 Q. Dr. Wright, do you recognize the email on the bottom being
17 an email from you requesting an evaluation?

18 A. Yes. I recognize Lee 1 is a valuer that is highly regarded
19 by the tax office and was recommended by KPMG.

20 MR. FREEDMAN: Your Honor, Plaintiffs offer P181 into
21 evidence.

22 MS. MCGOVERN: Objection, Your Honor. Hearsay.

23 THE COURT: The objection is overruled. It would be
24 admitted into evidence.

25 (Plaintiffs' Exhibit 181 received into evidence.)

1 BY MR. FREEDMAN:

2 Q. Dr. Wright, here you say: "Hello, Lee. The software you
3 are doing a cost evaluation for is the W&K project we have been
4 integrating into our group of companies."

5 Do you see that?

6 A. I do.

7 Q. And then you say: "These total 6,080,555 lines of code."

8 Do you see that?

9 A. Yes. As I stated, the core banking platform is incredibly
10 complex. That's what people don't realize. The -- we're
11 actually quite happy with this. It was less complex than the
12 Temenos software we'd used in the past. But the comparative
13 was, we were looking at, the Australian Commonwealth Bank had
14 done an upgrade on their core banking, and their core banking
15 software for the Australian Commonwealth Bank to handle the
16 sort of volume we wanted to do cost 4 billion Australian
17 dollars in 2014.

18 So to be able to buy banking software for that price, I was
19 initially chauffeured, happy, because I actually think the Saudis
20 gave us a discount thinking we couldn't sell it or couldn't do
21 like Temenos and they expected that we would fail. So they
22 looked at it as they got a whole lot of rights to Bitcoin that
23 are now way more valuable. And they said if we succeed, they
24 get a banking platform that works and is better; if we fail,
25 they lose nothing and they got something for free. So ...

1 Q. The next month, Dr. Wright, Mr. Goldstein sends you the
2 results of his valuation, correct?

3 A. I don't remember the date. Sorry. I'd need to see it.

4 MR. FREEDMAN: Ms. Vela, let's put up P183. This
5 document is in evidence.

6 BY MR. FREEDMAN:

7 Q. November 14th, 2014. Subject: "Valuation. Kind regards,
8 Lee."

9 Do you see that?

10 A. I see the email, yes.

11 MR. FREEDMAN: Ms. Vela, can you please bring us to
12 Page 2.

13 BY MR. FREEDMAN:

14 Q. And he's doing an assessment at your request of the W&K ID
15 software in your four companies, Cloudcroft, Hotwire,
16 Coin-Exch., and CO1N, correct?

17 A. No. It's not at my request. It was for the companies, but
18 it's from the accounting team.

19 MR. FREEDMAN: Okay. Ms. Vela, can you please bring
20 us to Page 17 of the report, and can we zoom in to the bottom
21 half.

22 Yeah, right there.

23 BY MR. FREEDMAN:

24 Q. "W&K Source Share, 46 percent. W&K Source will enable
25 research activities associated with Virtual Universe."

1 Do you see that, Dr. Wright?

2 A. Yes. And if you just zoom out from the page again, what
3 you will actually see, as you tried to do, was computer
4 hardware designs. Basically Cloudcroft there was buying
5 management software and the source is the Siemens software.

6 So we bought software from the Siemens Company in Germany,
7 which, whether you like it or not, was demonstrated to the tax
8 office; they just didn't like it. And basically that was for
9 the management of computers. So yes, all up, about a little
10 under two and a half million lines of code, all up.

11 MR. FREEDMAN: Ms. Vela, can you please bring us to
12 Page 18 of the valuation report. Can we zoom in to the "W&K
13 Source Share" again.

14 BY MR. FREEDMAN:

15 Q. "W&K Source Share, 32 percent. W&K Source will enable the
16 creation of a world-class solution platform and support to
17 research activities undertaken as part of Coin-Exch., CO1N and
18 Cloudcroft."

19 Do you see that?

20 A. I certainly do. And once again, as I was saying, what I
21 wanted to do was build a banking system based on Bitcoin. Not
22 as easy as people think. Certainly harder than -- I thought it
23 was easier. I was wrong.

24 MR. FREEDMAN: Ms. Vela, can you bring us to the next
25 page of the valuation report.

1 Thank you.

2 BY MR. FREEDMAN:

3 Q. Dr. Wright, "W&K Source Share, 6 percent. W&K Source will
4 enable the creating of a fast and stable trading platform to
5 trade Bitcoin as fundamental currency to buy and sell
6 traditional assets and securities."

7 Do you see that?

8 A. I certainly do. And again, if I had succeeded rather than
9 Coinbase, it would be Coin-Exch. Rather than having Coinbase
10 as a hundred-billion-dollar company, it would be one of my
11 companies as this.

12 We were trying to do this. We had invested a lot of money
13 in trying to do that. And rather than having a
14 hundred-billion-dollar company that the Australian government
15 would tax immensely and take a lot of money from, they managed
16 to shut it all down because they didn't like Bitcoin. And
17 unfortunately, your client helped.

18 MR. FREEDMAN: Ms. Vela, can we go to the next page,
19 please.

20 BY MR. FREEDMAN:

21 Q. "W&K Source Share, 16 percent. W&K Source will enable the
22 development of transaction protocols and rule-based algorithms
23 to significantly reduce transaction times and design novel
24 security protocols and encryption algorithms without
25 compromising transaction times or scalability."

1 Do you see that?

2 A. I certainly do. And I'd forgotten about the Q2 compiler.
3 The CO1N supercomputer that I told you about, it required the
4 ability to use CUDA, which is a multi-core system. So when you
5 look at graphics cards that are put in machines, like your
6 normal home computer may have 12 or 24 cores. We were running
7 machines that had six cards or eight cards of six thousand
8 cores. And we had a thousand of those, so we needed highly
9 specialized software to try and build this.

10 Because if you imagine trying to write parallelized
11 software over six cores being hard, now multiply six by six
12 thousand by a thousand. So that's why we had -- at one point,
13 I had 50-something staff, a lot of them with Ph.D.s, a lot of
14 them with other things. So we're talking -- machine learning
15 is what people call artificial intelligence now. And graph
16 reduction is one of the most complex areas of mathematics.

17 Fibonacci retracements are used in system modeling, so we
18 were trying to even do this. And the other aspect that I was
19 still working on that didn't go anywhere was VRML
20 visualization. So I was actually one of the early development
21 team people. I got -- if you remember Oculus, I was on the
22 development team for that. I got one in my company early and
23 we were trying to actually do it so that we could have a future
24 visual world like Ready Player One, if people have seen that
25 movie. I keep mentioning it because one of the games they

1 mention was actually one I designed, or helped design in the
2 '80s, but that's a side thing. Sorry.

3 But we were trying to even go into the thing where we can
4 have a virtualized world where people could buy and sell like
5 Second Life, like Mark Zuckerberg's now doing, which is exactly
6 line for line my Metanet thing that I talked about in 2018 that
7 is now Metaverse. And we were trying to do that in '13 and
8 '14.

9 So yes, I remember all that.

10 Q. Dr. Wright, I've shown you four numbers: 46 percent, 32
11 percent, six percent and now 16 percent. Those add up to a
12 hundred percent, correct?

13 A. I haven't actually added them, but they're close.

14 Q. So you transferred a hundred percent of W&K's source code
15 to these Australian companies, didn't you?

16 A. No. Once again, it's W&K's source, which means the things
17 that we purchased. So, as I was saying, that's a total
18 misrepresentation. I bought a lot of software. My companies
19 bought a lot of software.

20 As I keep saying, if you're talking about machine learning,
21 you're doing around 50 to a hundred lines of code a day per
22 person. Now, if you imagine when I've got 300,000 lines of
23 code, now divide that -- if you've got really good coders and
24 they're doing a hundred lines, that's 3,000 days. 3,000 man
25 days. That's not something that you just flick your fingers

1 and it happens like he's trying to imagine.

2 MR. FREEDMAN: Ms. Vela, let's go to Page 24 of the
3 valuation report, please.

4 Can you zoom in on the conclusion, please.

5 BY MR. FREEDMAN:

6 Q. "The valuation report has valued the software engineering
7 for the four companies controlled by DeMorgan using the cost
8 base that the software has a value of \$378,475,713."

9 Do you see that?

10 A. Yes, I do. And as I stated, the rights to be able to use
11 that software remained in W&K the whole time. So, ironically,
12 if Ira wanted to go and compete with me, if Ira wanted to take
13 my code and the code that we did and start a company, if he had
14 wanted to build something -- not just take money, build. To
15 hire staff, to watch something grow, to see a company and make
16 something grow from nothing to something which is -- anyone
17 who's had a business, it's something -- I don't know how to
18 describe it.

19 But if you have run a business before, if you started
20 something from nothing and watched it grow, there's a feeling.
21 It's a tingling feeling through your body. It's electric. If
22 he wanted to do that, he could have, and he still could. He's
23 chosen -- doesn't want to.

24 Q. Dr. Wright, in 2015, you then talked with a broker about
25 finding potential investors, correct?

1 A. No. We talked to people all the time. See, I'm not a CEO
2 anymore because I hate that part of the job. I'm just a chief
3 scientist now. All I have to do is worry about inventing
4 things.

5 When I was CEO, the role of a CEO is to ensure that the
6 company is funded. So it wasn't in 2015, I talked to someone.
7 In 2009, in 2010, in 2011, in 2012, in 2013, in 2014, in 2015,
8 I was always talking to people. I would be out there selling
9 myself to venture capital firms. I would be there -- basically
10 the only way to put it is prostituting myself to get money
11 invested in my companies. I would go out there and try and
12 sell all the benefits and why this is the next best thing.
13 That's what CEOs do.

14 Q. But in 2015, you spoke to a broker to find you an
15 investment called Sterling Group, correct?

16 A. Sorry. Don't remember Sterling. Can you show me the
17 document?

18 MR. FREEDMAN: Ms. Vela, can you please play clip
19 number 46 from Dr. Wright's deposition on March 18th, 2020,
20 Page 26, lines 4 through 11.

21 (Video played.)

22 BY MR. FREEDMAN:

23 Q. In 2015, Dr. Wright, you met with Mr. Matthews regarding a
24 potential investment from Mr. Ayre, correct?

25 A. No. I'd already been meeting with Mr. Matthews from 2014,

1 as you showed in the other things. I had been in continuous
2 negotiations and relations with Mr. Matthews from 2007 because
3 I was the auditor for Centrebet, which were a gaming company in
4 Australia, public listed one.

5 And I'd known Stefan through all his -- like with Bodog,
6 which was Calvin's company, gaming company. So I didn't start
7 negotiations in 2015. I had been talking with Stefan from
8 2009. Stefan -- actually, I tried to get Stefan involved in
9 Bitcoin even in 2009.

10 I offered Stefan 50,000 Bitcoin for a hundred dollars. If
11 you can imagine what that's worth now. He turned me down. He
12 actually told me: "No. I don't want this Bitcoin stuff, but
13 if you need the money, I'll give you a hundred dollars."

14 I said: "I don't want your money. I would like you to
15 take my Bitcoin. I want to sell you Bitcoin." He said: "No.
16 How about I just give you a hundred dollars?" I went: "How
17 about I give you the Bitcoin?" And he went: "No. I don't
18 want that shit." I actually had a big argument with him. "Can
19 you please buy my Bitcoin?" He went: "No. But I'll give you
20 the hundred dollars."

21 So strangely enough, I couldn't even sell Bitcoin in 2009.
22 50,000 for a hundred dollars and he turned it down.

23 But I did get contacts through Mr. Ayre in 2014, as well as
24 Mr. MacGregor, two separate people, from Stefan, and I
25 continued -- I had meetings with them as well.

1 MR. FREEDMAN: Your Honor, now is a good time for a
2 break for us, if it works for the Court.

3 THE COURT: Yes. Certainly.

4 Ladies and Gentlemen, let's take a 20-minute recess.

5 (Jury not present, 11:22 a.m.)

6 THE COURT: All right. Go ahead and have a seat.

7 I have permitted over the last several days of
8 testimony, because it has been somewhat consistent with the
9 evidence that has been admitted into evidence, the expletives
10 and the gutter language that has been testified to. And I
11 would request that all witnesses refrain from using expletives
12 that are inappropriate in a court of law.

13 We'll take a 20-minute recess.

14 (Recess from 11:23 a.m. to 11:43 a.m.)

15 THE COURT: All right. Welcome back. Are we ready to
16 continue?

17 MR. FREEDMAN: Yes, Your Honor.

18 THE COURT: All right. Dr. Wright, you have been
19 given fair warning of your use of offensive language. If you
20 do it again, I will admonish you in front of the jury. Do you
21 understand that, sir?

22 THE WITNESS: I do. I was quoting someone, Your
23 Honor.

24 THE COURT: No, sir. It was said several times this
25 morning. It wasn't a quote. It wasn't referenced to testimony

1 or -- excuse me -- evidence in the record to which I have noted
2 that language. I'm speaking of your testimony. Do you
3 understand that, sir?

4 THE WITNESS: I do.

5 THE COURT: All right. Let's bring in the jury.

6 (Before the Jury, 11:43 a.m.)

7 THE COURT: All right. Welcome back, Ladies and
8 Gentlemen.

9 Please be seated.

10 And we'll continue with the testimony.

11 MR. FREEDMAN: Ms. Vela, can you please bring up P191
12 for the witness and counsel.

13 BY MR. FREEDMAN:

14 Q. And, Dr. Wright, do you recognize the email at bottom of
15 the page from yourself to Stefan Matthews about an investment
16 we were talking about?

17 A. Yes. I recognize that I forwarded the letter to my
18 barrister at the time who was involved with our tax issues, and
19 yes, I was trying to get Mr. Ayre to invest.

20 MR. FREEDMAN: Your Honor, Plaintiffs offer P191 into
21 evidence.

22 MS. MCGOVERN: Objection, Your Honor. Relevance.
23 Hearsay.

24 THE COURT: The objection is overruled. It will be
25 admitted into evidence.

1 (Plaintiffs' Exhibit 191 received into evidence.)

2 BY MR. FREEDMAN:

3 Q. Dr. Wright, email from yourself to Stefan Matthews:

4 "Hello. We have a face-to-face meeting with Stefan Matthews
5 who represents and runs Calvin Ayres Investment Trust next
6 week. The call and email is as positive as one can hope for
7 right now. We will look at an initial bridging loan and first
8 round \$2 million investment."

9 Do you see that?

10 A. Yes, I do. And basically what this is saying is that we
11 tried to actually have a bridging loan over the company, which
12 is finance, and a potential \$2 million investment into one of
13 the companies in the group.

14 Q. And, Dr. Wright --

15 MR. FREEDMAN: Thank you, Ms. Vela.

16 BY MR. FREEDMAN:

17 Q. Dr. Wright, around this time, you told Mr. Ayre that you
18 were purportedly arranging things -- sorry -- that you were
19 purposely arranging things because you did not want to have any
20 challenges to any IP later on when things start to get big,
21 correct?

22 A. I don't remember what I said. Sorry.

23 MR. FREEDMAN: Ms. Vela, can you put P217 up for the
24 witness and counsel.

25 And can we go to Page 2., and can you zoom into the

1 end of Dr. Wright's response.

2 BY MR. FREEDMAN:

3 Q. Dr. Wright, this is an email from yourself to Calvin Ayre
4 speaking about companies and IP?

5 A. Well, I can't see the rest of the email.

6 MR. FREEDMAN: Ms. Vela, can you zoom out for
7 Dr. Wright, please.

8 (Pause in proceedings.)

9 THE WITNESS: Yes. This would have been something I
10 think it was Angela, my EA at the time, would have sent for me.
11 I don't recognize it, but I know that I asked for it to be
12 sent. So it is a valid -- that I asked for.

13 MR. FREEDMAN: Your Honor, Plaintiffs offer P217 into
14 evidence.

15 MS. MCGOVERN: Objection, Your Honor. Relevance.
16 Hearsay.

17 THE COURT: On grounds of hearsay?

18 MS. MCGOVERN: And relevance, Your Honor.

19 THE COURT: Overruled. It will be admitted into
20 evidence.

21 (Plaintiffs' Exhibit 217 received into evidence.)

22 MR. FREEDMAN: Ms. Vela, can you bring us back to Page
23 2, the end of the email between Dr. Wright and Mr. Ayre.

24 BY MR. FREEDMAN:

25 Q. "So what I'm seeking to do is have the entity as clean and

1 polished as I can before we start going forth. I do not want
2 to have any challenges to any IP later on when things start to
3 get big.

4 "I want to remove any ownership from former directors
5 before they know what it could become so they cannot challenge
6 anything later."

7 Do you see that, Dr. Wright?

8 A. Yes. I did. I had a interaction with a director that we'd
9 removed -- no, that's not Ira because he never accepted a
10 directorship -- and we wanted to make sure that that person did
11 not cause any problems.

12 And yes, we were trying to build an exchange in a bank, so
13 I needed it clean.

14 Q. And shortly --

15 MR. FREEDMAN: Thank you, Ms. Vela.

16 BY MR. FREEDMAN:

17 Q. Shortly after this, Dr. Wright, in June of 2015, your
18 companies and Sterling Group reached a preliminary deal for
19 your companies to sell all of their intellectual property,
20 correct?

21 A. Absolutely wrong. We had a licensing agreement. So what
22 he's again missing is that all my Australian companies kept one
23 hundred percent rights to build their software, but we licensed
24 the software to an overseas group.

25 MR. FREEDMAN: Ms. Vela, can you pull back up P229 --

1 sorry -- for counsel and the witness.

2 And can you go to Page 7, please.

3 BY MR. FREEDMAN:

4 Q. Dr. Wright, you see your signature down at the bottom?

5 A. I do.

6 MR. FREEDMAN: And, Ms. Vela, can you bring us to Page
7 2 for a minute.

8 BY MR. FREEDMAN:

9 Q. Do you see at the top paragraph it talks about intellectual
10 property being purchased?

11 A. Yes. I see this was a term sheet, but this isn't the one
12 that actually occurred.

13 MR. FREEDMAN: Okay. Your Honor, Plaintiffs offer
14 P229 into evidence.

15 MS. MCGOVERN: Objection, Your Honor. Relevance and
16 hearsay.

17 THE COURT: The objection is overruled. It will be
18 admitted into evidence.

19 (P Plaintiffs' Exhibit 229 received into evidence.)

20 MR. FREEDMAN: Ms. Vela, can you zoom in on that email
21 that attaches the term sheet.

22 BY MR. FREEDMAN:

23 Q. So Robert MacGregor sends you an email. Mr. Ayre is cc'd,
24 Mr. Matthews is cc'd, Ms. Watts, your wife, is cc'd. Subject:
25 "Congratulations."

1 Do you see that?

2 A. I do. As I said, this was an initial term sheet. It's not
3 actually the contractual -- what you do call it -- contractual
4 exchange. What it did was give us a sort of loan agreement and
5 bridging finance while we were negotiating in full.

6 MR. FREEDMAN: Ms. Vela, can you bring us to Page 2,
7 please.

8 And can you highlight, Ms. Vela, up until in the first
9 paragraph -- that's okay. You can zoom in there.

10 Can you highlight the beginning paragraph that starts
11 off with: "\$15 million asset purchase."

12 MS. MCGOVERN: Objection, Your Honor. Misstates the
13 document.

14 MR. FREEDMAN: Sorry. "\$1.5 million asset purchase."

15 THE COURT: Sustained.

16 MR. FREEDMAN: Up until the number one.

17 Thank you.

18 BY MR. FREEDMAN:

19 Q. Dr. Wright, can you read for us the summary of the agreed
20 terms that you executed, please, for the record.

21 A. Sorry. These weren't executed. This is an initial term
22 sheet. So technically that's not executed.

23 MR. FREEDMAN: Ms. Vela, can you bring us to Page 7,
24 please.

1 BY MR. FREEDMAN:

2 Q. Sorry, Dr. Wright, is that your signature on the bottom of
3 page?

4 A. Yes. I mean, I signed that, but the contract that followed
5 was executed. This is an agreement to have an agreement.

6 Q. And that's Ms. Watts's signature on the page?

7 A. Like I said, we had an agreement to have an agreement. A
8 later agreement was then followed up.

9 Q. And that's Mr. Matthews' signature on the page, as well,
10 correct?

11 A. That is correct.

12 Q. All right.

13 MR. FREEDMAN: Let's go back to Page 2, please, Ms.
14 Vela.

15 BY MR. FREEDMAN:

16 Q. Dr. Wright, please read the executed agreement that's
17 highlighted.

18 A. Again, it's not an executed agreement. I'll read the
19 agreement, but there's no executed agreement here.

20 Q. Please.

21 A. "Phase 1, stabilize and clean up. \$1.5 million asset
22 purchase Australian money. NewCo will purchase outright all IP
23 and technology in DeMorgan Company and all company subsidiaries
24 and identified assets for 1.5 million."

25 Q. Purchase outright all IP, not licensing IP, correct, Dr.

1 Wright?

2 A. Again, this isn't the final agreement. The agreement was
3 not executed that way.

4 MR. FREEDMAN: Ms. Vela, can you please go to Page 3
5 for us of that agreement.

6 BY MR. FREEDMAN:

7 Q. "Equity in NewCo. Upon incorporation, NewCo will
8 immediately grant to the rights with 37 percent of issued and
9 outstanding voting common stock."

10 Do you see that?

11 A. Yes, I do.

12 Q. So NewCo purchases all the IP and you get 37 percent of the
13 equity, correct?

14 A. No. It actually didn't happen that way. Sorry.

15 MR. FREEDMAN: Ms. Vela, can you highlight the bullet
16 that starts off with: "3,500,000 Rights and Services
17 Agreement"?

18 BY MR. FREEDMAN:

19 Q. Dr. Wright, can you please read that for us.

20 A. Yes, I can. "3.5 million Rights and Services Agreement.
21 NewCo will enter and a direct services deal with Craig Wright
22 as chief scientist," basically followed by an annual payment of
23 half-million dollars for five years.

24 Q. You sell all of the IP for 1.5 million dollars, 37 percent
25 of it you'll retain ownership for, and you'll get a

1 \$3.5 million salary?

2 A. No. Again, that's wrong. I've got a 162.5 British pounds
3 salary per annum, which is not the biggest in the company. So
4 this was the initial negotiation. We didn't end up going
5 through with that.

6 MR. FREEDMAN: Ms. Vela, can you please bring up P216
7 for the witness and counsel.

8 P216, Ms. Vela.

9 BY MR. FREEDMAN:

10 Q. Dr. Wright, do you see this is an email from yourself to
11 Stefan Matthews and others talking about DeMorgan, and it's
12 characterized as a parent company?

13 A. No. I see it's an email from C to Craig Wright. That's
14 forwarding an email.

15 MR. FREEDMAN: Ms. Vela, can we help, Dr. Wright?

16 Thank you.

17 BY MR. FREEDMAN:

18 Q. Do you see it now?

19 A. I see that there's a forwarding email. Inside, yes.

20 MR. FREEDMAN: Okay. Plaintiffs offer P216 into
21 evidence, Your Honor.

22 MS. MCGOVERN: Objection, Your Honor. Hearsay and
23 relevance.

24 THE COURT: Overruled. Admitted into evidence.

25 (Plaintiffs' Exhibit 216 received into evidence.)

1 BY MR. FREEDMAN:

2 Q. Dr. Wright, in this email -- in this email, you say that
3 the parent company -- "Also, can one of you guys" -- I'm
4 reading the subject. "Also, can one of you guys give Catherine
5 the full legal name of the Australian R&D parent company. The
6 Australian company parent company is DeMorgan?"

7 Do you see that?

8 A. Yes. I see that.

9 MR. FREEDMAN: Okay. Ms. Vela, you can take that
10 down.

11 Can we please put up P350 for the witness and counsel.
12 P350. But just witness and counsel.

13 There we go.

14 BY MR. FREEDMAN:

15 Q. Dr. Wright, do you see this is an implementation deed that
16 involves yourself?

17 A. What I see is a later contract that was done between the
18 company, myself, and a different company, Calay Holdings.

19 MR. FREEDMAN: And, Ms. Vela, can you please bring us
20 to Page 24.

21 BY MR. FREEDMAN:

22 Q. Is that your signature at the bottom, Dr. Wright?

23 A. Yes, that is.

24 MR. FREEDMAN: Ms. Vela, can you bring us to Page 6.
25

1 BY MR. FREEDMAN:

2 Q. Do you see the binding term sheet we've just mentioned
3 being referenced on the top of the page, Dr. Wright?

4 A. Yes, I do. And it also references the bridging loan that
5 was in there, as well. So this is tied to a combination of the
6 bridging loan and the assets.

7 MR. FREEDMAN: Your Honor, Plaintiffs offer P350 into
8 evidence.

9 MS. MCGOVERN: Hearsay, Your Honor.

10 THE COURT: The objection is overruled. It will be
11 admitted into evidence.

12 (Plaintiffs' Exhibit 350 received into evidence.)

13 BY MR. FREEDMAN:

14 Q. Dr. Wright, we're looking at something called an
15 "Implementation Deed" between DeMorgan, the parent company for
16 all the R&D, Calay Holdings, and Craig Steven Wright. Do you
17 see that?

18 A. I do.

19 MR. FREEDMAN: Ms. Vela, let's show the signature page
20 on 24, please.

21 BY MR. FREEDMAN:

22 Q. Like the binding term sheet, this is signed by both you,
23 Ms. Watts, and Mr. Matthews, correct?

24 A. Yes, it is.

25 MR. FREEDMAN: And, Ms. Vela, can you please bring us

1 to Page 6, and can you call out for us Paragraph 3.2.

2 BY MR. FREEDMAN:

3 Q. Dr. Wright, you'll recall that the binding term sheet had
4 you selling all the intellectual property to NewCo. In
5 paragraph 3.2 it says: "The parties agree that NewCo, as
6 referred to in the binding term sheet, is nCrypt Holdings,
7 LTD."

8 Do you see that?

9 A. I see the reference, yes.

10 MR. FREEDMAN: Ms. Vela, can you put that on the
11 left-hand side. Let's minimize that call out and put it on the
12 left-hand side.

13 And on the right, let's bring up P229, which is the
14 term sheet. Let's go to Page 3, please.

15 And, Ms. Vela, can you highlight on the right-hand
16 side: "Equity in NewCo upon incorporation."

17 BY MR. FREEDMAN:

18 Q. So, Dr. Wright, you agree that you and your wife would be
19 part owners of this new company, correct?

20 A. No --

21 Q. Of nCrypt -- sorry. Go ahead.

22 A. No. As I stated, this was a term sheet and the final sale
23 didn't work out this way.

24 MR. FREEDMAN: Thank you, Ms. Vela.

25

1 BY MR. FREEDMAN:

2 Q. Dr. Wright, in 2015, you never mentioned anything to Ira
3 about nCrypt; isn't that correct?

4 A. No reason to.

5 Q. You did not mention anything to Ira about nCrypt, correct?

6 A. Don't remember. I had no reason to.

7 MR. FREEDMAN: Ms. Vela, can you please play clip 50A
8 from Dr. Wright's March 18th, 2020 deposition?

9 For the record, it's Page 62, lines 12 through 14.

10 (Video played.)

11 BY MR. FREEDMAN:

12 Q. Dr. Wright, you never mentioned to Ira throughout 2015 that
13 you were planning to sell Coin-Exch. intellectual property and
14 technology to Sterling Group, nCrypt or nChain, correct?

15 A. Ira had never wanted to be a director. If he chose to be a
16 director, he would have known about these things. But -- I'm
17 sorry. Day-to-day operations of companies don't involve sort
18 of shareholders. Just the way it works.

19 MR. FREEDMAN: Ms. Vela, can you please play clip 50B
20 from Dr. Wright's March 18th, 2020 deposition.

21 For the record, it's Page 62 lines 15 through 19.

22 (Video played.)

23 BY MR. FREEDMAN:

24 Q. But around July of 2015, Dr. Wright -- and that's after the
25 term sheet is executed, but before the final IP agreement is

1 executed -- you email -- Ira emails you again about Coin-Exch.,
2 doesn't he?

3 A. Don't remember.

4 MR. FREEDMAN: Ms. Watts, can you -- sorry. Ms. Vela,
5 can you please put up P241 for the witness and counsel.

6 BY MR. FREEDMAN:

7 Q. Dr. Wright, do you see on the bottom you've got an email
8 from Ira Kleiman to you talking about Coin-Exch.?

9 A. Don't recollect it. Sorry.

10 MR. FREEDMAN: Your Honor, Plaintiffs offer P241 into
11 evidence.

12 MS. MCGOVERN: No objection.

13 THE COURT: Without objection, admitted into evidence.
14 (P Plaintiffs' Exhibit 241 received into evidence.)

15 BY MR. FREEDMAN:

16 Q. Dr. Wright, Ira emails you on July 8th, 2015: "I feel like
17 I'm pushed in a direction that leads toward legal action, but
18 it's really not what I want. I don't want to cause anyone to
19 get in trouble. I will sell most of my shares, but would still
20 like to retain a small part as part of Dave's involvement. For
21 six million, I would sell 90 percent of my shares."

22 Do you see that, Dr. Wright?

23 A. Yes, I do.

24 Q. You forward that email on to Stefan Matthews, don't you:
25 "FYI"?

1 A. That's what the document says.

2 Q. And he responds back: "I am laughing to myself and
3 rehearsing responses I would suggest. Let's just sit on this
4 and discuss tomorrow."

5 Do you see that?

6 A. I do.

7 Q. So you were stripping the intellectual property out from
8 these companies that belonged to the estate and you were all
9 laughing to yourselves, weren't you?

10 A. No. These companies did not belong to the estate, like you
11 keep misrepresenting. The shareholding is listed. It was an
12 Australian public company. Listed companies owned a small
13 amount by W&K, not Mr. Kleiman, had assets. And no, no
14 stripping because the assets remained with those companies.

15 My plan had been to set up an exchange. My plan had been
16 to set up a bank. Unfortunately, I could not sell that idea to
17 anyone.

18 Q. In an August --

19 MR. FREEDMAN: Ms. Vela, can you please put up P256
20 for counsel and the witness.

21 BY MR. FREEDMAN:

22 Q. Dr. Wright, in August, Ira Kleiman reaches out for more
23 information once again about Coin-Exch., doesn't he?

24 A. I don't remember. Sorry.

25 Q. Do you see in the middle of the page --

1 MR. FREEDMAN: Ms. Vela, can you zoom in on that for
2 us.

3 BY MR. FREEDMAN:

4 Q. -- an email from Ira to yourself on August 28th, 2015?

5 A. I see the document.

6 MR. FREEDMAN: Your Honor, Plaintiffs offer P256 into
7 evidence.

8 MS. MCGOVERN: No objection.

9 THE COURT: Admitted into evidence.

10 (Plaintiffs' Exhibit 256 received into evidence.)

11 BY MR. FREEDMAN:

12 Q. Dr. Wright, Ira says: "I wish I could believe that you
13 have my best interests at heart, as I was first led to believe
14 in your early emails. But after the long delays of promised
15 payments I was to receive each October and the strange offer to
16 purchase my shares from an undisclosed investor, obviously, I
17 have doubts. Doing nothing is not a viable option for me any
18 longer."

19 Do you see that?

20 A. Yes. I see that when he was offered at the peak \$12
21 million, where he could have gone to -- see, the thing with
22 owning shares, if I give you an offer for \$12 million, and you
23 think I'm totally basically trying to rip you off, then you can
24 go out to the market. And if someone offers you \$15 million,
25 you take it. That's how shares work.

1 So it's very simple here. The largest offer on the table
2 was \$12 million from me personally -- not the company, because
3 the company can't buy back shares in Australia. It's illegal --
4 me, me personally. And he refused. He wanted more. He didn't
5 want to have tax. Neither of those would work. So very
6 simple. He had offers. He rejected them.

7 And the thing you are missing, as a director and as a CEO
8 of the company, my obligation is to the majority of the
9 shareholders. He was not offered money every month. He was
10 offered a directorship. A directorship that, if he took, had
11 monthly payments. Only -- and I emphasize only if he formally
12 accepted the directorship and worked. Not that he gets to sit
13 there and get money for nothing.

14 I don't give people money for nothing. I will pay people
15 to do a job. I will pay people if they're obligated. I will
16 not give someone money for nothing. I don't care. I had a
17 single mother. I grew up watching someone work three jobs. I
18 will never -- and I emphasize never -- give someone nothing --
19 sorry -- something for absolutely nothing. I will give them
20 something. I will give them a really, really good deal.

21 Thirty thousand dollars for 30 days' work -- 30,000 a month
22 for 30 days' work is more than most people ever imagine, more
23 than most people on this earth would dream about. And he
24 turned it down. So no, there was no offer for just getting
25 money to do nothing.

1 Q. What you didn't tell Ira, Dr. Wright, is that you had
2 already signed a binding term sheet to strip all the
3 intellectual property out of the company that you told him he
4 was a shareholder of. You looted the company by this point,
5 hadn't you?

6 A. Again, I was already not a director at this stage. And
7 secondly, what they were buying is me. W&K had full rights to
8 that software at all points. If he thinks he can go out there
9 and make a company on that software, he can today. He can take
10 and it try and build a business. Because here's the thing: If
11 you have software, it is worth nothing without customers.

12 You might be the best plumber on earth. But if you don't
13 get a customer, your business is not worth anything. You might
14 be the best chef. But if you can't get a customer into your
15 restaurant, it's worth nothing.

16 Q. Let me ask you again, Dr. Wright: Did you tell Ira Kleiman
17 that at this point you had already looted the company of all
18 its intellectual property?

19 MS. MCGOVERN: Objection. Asked and answered.

20 THE COURT: Overruled. I'll allow it.

21 THE WITNESS: Again, no looting. W&K owned every
22 single right, and it still does today. He can take and exploit
23 the software today. He can go out and try and find investors
24 today. If he wanted to run W&K, if he wanted to hire people --
25 and I did. My group of companies had 55 staff before all the

1 problems were exaggerated by Mr. Kleiman, 55 people who worked
2 hard. Not -- I mean, I'm a horrible slave driver of a boss, as
3 any staff member will tell you.

4 Some of them ended up going on Twitter and calling me
5 all sorts of horrible names. Others liked the fact that I work
6 them because they get great results. Some of my staff have
7 worked with me to get some magnificent papers that are
8 published in places like Cambridge because I push them hard. I
9 get results. I work people to the bone and then I reward them
10 well when they do. Some people like that. Some people don't.

11 If he wants, every single bit of that software is
12 there right now. He could take it. He could try and build
13 something. It's hard.

14 Q. Dr. Wright, Ira Kleiman tells you: "Tell me what you
15 believe is a reasonable settlement so I can just walk away. If
16 we can't figure it out on our own, then let my attorney speak
17 with yours. Maybe they can arrange something that will finally
18 put my concerns to rest." Do you see that?

19 A. Yes. And as I said, \$12 million, I think, for one week of
20 work for a friend who helped me put together code -- I think
21 \$12 million -- I don't know about you, but I came from nothing.
22 Twelve million dollars is not nothing. He's making out.
23 There's only: "Didn't get enough. I can see more."

24 The companies, in 2013 and 2014, weren't worth what they
25 are now. The assets weren't worth what they are now. So when

1 someone sits there and says: "The 12 million, if it was in
2 Bitcoin, could be worth dot, dot, dot today," the thing to
3 remember is that man didn't want to hold Bitcoin. He didn't
4 want to hold assets. He didn't want to build. He didn't want
5 to grow. He didn't want people working basically to create
6 something. He wanted to strip it. He wanted to loot it. He
7 wanted to take it and basically eviscerate it so that he could
8 sit there drinking Mai Tais, not actually working.

9 So what I have done is I've started again every time I have
10 had a failure. And now I have, in what he calls a sham,
11 created companies that have hundreds, and I mean hundreds, of
12 staff. And I work them. Because when they achieve they are
13 proud. I'm proud of what they do. They're proud of what they
14 do. Some of them are here. Some of them are watching. They
15 come and they're here and they want to watch this because
16 they're proud of what they're achieving.

17 So no, I don't loot. I build. And if you don't want to be
18 part of building, I'm not going to help you take money out. If
19 you can find a buyer or a seller or you can get a deal, I'm not
20 stopping you. If you can take that source code and you can
21 make a deal, I'm not stopping him. But he doesn't know how.

22 So the simple answer is: I'm not stopping him from making
23 more than \$12 million. The offer was there. He rejected it.
24 No one else is offering him because he has no idea what to do
25 with it.

1 Q. Actually, Dr. Wright, what you actually did with your group
2 is tell Ira to take a flying leap, essentially, unless he
3 actually had a lawyer contact you; isn't that right?

4 MS. MCGOVERN: Objection. Objection, Your Honor.

5 THE COURT: The objection is overruled. I'll allow
6 it.

7 THE WITNESS: No.

8 MR. FREEDMAN: Ms. Vela, can you please put up P257
9 for the witness and counsel.

10 BY MR. FREEDMAN:

11 Q. Dr. Wright, you send an email to Stefan Matthews and Ramona
12 Watts. And in response, you get an email from Stefan Matthews
13 about Ira. Do you see that?

14 A. Yes. I understand that Stefan wanted Ira to take a flying
15 leap.

16 MR. FREEDMAN: Your Honor, Plaintiffs offer P257 into
17 evidence.

18 MS. MCGOVERN: Objection, Your Honor. 403, hearsay.

19 THE COURT: Overruled. It will be admitted into
20 evidence.

21 (Plaintiffs' Exhibit 257 received into evidence.)

22 BY MR. FREEDMAN:

23 Q. August 28th, 2015, Dr. Wright. Same day you received that
24 email from Ira, you send it over. And Stefan Matthews, the guy
25 you sold all the intellectual property to, responds: "Just

1 ignore him now. If we get a note in any form from his lawyer,
2 we will consider a response. But until then, he can take a
3 flying leap." Do you see that?

4 A. Yes. Stefan thought I was completely mad. I offered this
5 guy \$12 million. And as he says, interestingly, there is no
6 investment in any of the Australian entities, the thing that
7 you said that happened, and only an advance to DeMorgan to fund
8 legal. An advance being a loan and acquire IP. That is not
9 exclusive. "Not the business." So what ended up happening
10 wasn't the term sheet.

11 Q. Dr. Wright, you just added words into that email. What it
12 actually says is: "Only an advance to DeMorgan to fund legal
13 and acquire IP, not the business," which was Stefan Matthews
14 telling you: "The fact that Ira Kleiman has 49.5 percent of
15 the founder's shares in Coin-Exch. means nothing because you
16 stripped the IP out and you weren't selling the business.
17 Isn't that true?

18 A. No. The business kept going for a time in Australia while
19 we kept fighting the tax office. And no, the business wasn't
20 purchased. The business kept going as long as I could keep it
21 going. So "acquire IP" doesn't mean, like you're saying,
22 stripping it.

23 Intellectual property's really interesting. You know when
24 you buy a copy of a movie? Guess what? A studio owns the
25 rights. When you buy another copy and another, and you

1 download it from Amazon, and you do all these things, guess
2 what? Magic. Intellectual property of that software, et
3 cetera, can be copied. So two companies can have the same
4 thing.

5 Q. Dr. Wright, I now want to talk to you about what happens
6 after this agreement is signed with Sterling Group. You and
7 Mr. Matthews begin to take steps to ensure that W&K's IP was
8 protected, correct?

9 A. W&K's, no.

10 Q. And around this time, one of your companies, Hotwire, was
11 facing liquidation, correct?

12 A. No. Hotwire, we put into administration in 2014. That was
13 one of the ones I mentioned the other day that own -- that had
14 the lease on the property; why we got locked out in 2014. So
15 the price of Bitcoin was volatile, and I made a complete utter,
16 really bad, stupid error.

17 Bitcoin hit \$1,200 around December, 2013. And rather than
18 me being smart, and because I didn't cash out the cash, I
19 thought the value would stay up, which was a dumb thing because
20 I expanded the operations of the business and paid for a lot of
21 things, not realizing that Mt. Gox, the exchange, had a lot of
22 problems that other things had, and the price of Bitcoin
23 shortly after I made the expansions crashed back down to
24 between 200 and 300 dollars, leaving me with a lot of
25 short-term bills, a lot of staff to pay. And Mt. Gox and other

1 exchanges that we had corporate accounts with were no longer
2 available to exchange.

3 So in 2014, I placed the company into voluntary
4 administration. I had a shareholders' meeting and a staff
5 meeting. And I said to everyone: "If you don't force me to
6 put the company into administration, if you allow me to trade
7 through this, I will pay you a certain amount per month, and I
8 will give you eight Bitcoin each person, per month.

9 "If you -- it will be a secret vote, and the majority of
10 people will vote on that. If you agree, basically, the
11 agreement would be I'll pay you that at the end."

12 I needed three months. Unfortunately, the creditors voted
13 against me, and I took my deal. I put the company into
14 voluntary administration, which some people wanted to force
15 into liquidation. They didn't get to, and we traded out.

16 During that time, if I'd put Hotwire into liquidation, like
17 bankruptcy, then technically I could have bought it without
18 debt. I don't know if people know how bankruptcy works, but
19 you can basically say that you'll make a deal only to pay 10
20 cents on the dollar. I didn't. I made a deal with the
21 administrators to pay 100 cents on the dollar, and I did. And
22 a lot of people complained because it took me a year to pay
23 it -- everything off. I did. Every staff member got 100 cents
24 of everything they were owed. Every creditor, right down to
25 that coffee maker that I've said who had a \$150 bill, got paid,

1 rather than being the normal corporate executive who basically
2 has the typical: "I don't care about anyone."

3 I could have walked away. I could have been the nasty,
4 smart executive that everyone will say is smart and rational.
5 I didn't need to pay millions, millions to myself. Imagine 55
6 staff with an average salary, because they're tech, of 1
7 point -- sorry -- 145,000 a year. A lot of money. Double that
8 with offices, computers, six million a year for our data center
9 costs. I made sure we paid it all, every single cent. So very
10 simply, no, it wasn't in liquidation. We paid it out cleanly.

11 Q. The question was: Was facing liquidation? And I believe
12 you just answered yes?

13 A. No. I didn't answer yes. I said it was an administration
14 and it was not facing liquidation because I paid it out. In
15 2015, we paid out the company clean. No debt. None. Zero.
16 Zilch.

17 And if you have no -- the only debt -- the only debt that
18 was not paid was agreed, which was a little bit of debt to my
19 mother, a little bit to my wife's family, some debt to me, and
20 backpay to my wife. We agreed to forego that and eventually I
21 paid back my mother, but much later.

22 MR. FREEDMAN: Ms. Vela, can you please put up P --
23 sorry.

24 BY MR. FREEDMAN:

25 Q. Mr. Matthews, Dr. Wright, sends you a Hotwire business

1 record that discusses issues with the Hotwire IP that came from
2 W&K and what might happen in liquidation. Is that not correct?

3 A. Can you to show me the document, please.

4 MR. FREEDMAN: Ms. Vela, can you please put up P248
5 for the witness and counsel.

6 BY MR. FREEDMAN:

7 Q. Do you see the email is from the Stefan Matthew to you and
8 Ms. Watts. The subject is: "Hotwire." The attachment is:
9 "Hotwire Preemptive Intelligence PTY."

10 MR. FREEDMAN: And, Ms. Vela, can you bring us to
11 Page 4.

12 And one more page forward.

13 BY MR. FREEDMAN:

14 Q. And do you see W&K IP source code referenced, and the first
15 five words of that paragraph under "Core Issues"?

16 A. This is referring to Coin-Exch. Coin-Exch. So if you're
17 looking at that here, this is, like it says, highlighted. So
18 no, this is not the other.

19 This is the -- the tax office wanted to, as I said, force
20 payment of the GST before getting the refund. So if they could
21 do that, that would be a different issue. So this is not
22 liquidation of Hotwire. This is the tax office trying to force
23 issues in the other company.

24 MR. FREEDMAN: Your Honor, Plaintiffs offer P248 into
25 evidence.

1 MS. MCGOVERN: Hearsay and relevance, Your Honor.

2 THE COURT: Overruled. Admitted into evidence.

3 (Plaintiffs' Exhibit 248 received into evidence.)

4 MR. FREEDMAN: Ms. Vela, bring us back to the first
5 page, please.

6 BY MR. FREEDMAN:

7 Q. Dr. Wright, Stefan Matthews, a man who signed for Sterling
8 Group on the IP agreement, sends you an email, cc's your wife,
9 Ramona Watts, on July 24th, 2015. It's entitled "Hotwire" and
10 the attachment is entitled "Hotwire Preemptive Intelligence
11 PTY, LTD."

12 MR. FREEDMAN: Ms. Vela, please bring us to the next
13 page.

14 BY MR. FREEDMAN:

15 Q. The document has a title "Hotwire Preemptive Intelligence
16 PTY, LTD."

17 Do you see that?

18 A. I do.

19 Q. "Hotwire has entered administration" -- first paragraph --
20 "Hotwire has not by law traded since entering administration."

21 MR. FREEDMAN: Ms. Vela, bring us to Page 4, please.
22 "Core Issues."

23 Can you zoom in on that, Ms. Vela.

24 BY MR. FREEDMAN:

25 Q. "In the event of liquidation, it is reasonable to assume

1 that the capitalized software assets and the receivable from
2 Coin-Exch. would come under scrutiny, and creditors, the
3 Australian Taxation Office, would seek to determine the extent
4 to which they are able to recover against these assets. This
5 puts at risk software intellectual property held by Hotwire and
6 potentially software IP of Coin-Exch.

7 "It is" -- and do you see what Mr. Matthews puts in bold
8 and it italics: "It is the W&K intellectual property source
9 code that is a concern, as it potentially exposes Satoshi
10 Nakamoto and core blockchain intellectual property."

11 Do you see that, Dr. Wright?

12 A. Well, it doesn't actually say Satoshi Nakamoto but that is
13 what he was referencing. And as I said, the software that went
14 from Greyfog, I called on the books W&K IP because it went also
15 to W&K and Dave was meant to actually build on it. So yes, I
16 see it.

17 MR. FREEDMAN: Ms. Vela, can you put that onto the
18 left hand side for me a minute.

19 And can you please pick up P709, the Australian
20 lawsuit, and let's go to Page 30.

21 And, Ms. Vela -- yes, please. Can you call that out
22 for us.

23 BY MR. FREEDMAN:

24 Q. Dr. Wright, Mr. Matthews' statement that the intellectual
25 property from W&K could expose Satoshi Nakamoto and core

1 blockchain intellectual property is completely consistent with
2 your statement to the Australian courts two years earlier that
3 the intellectual property and software is software and code
4 used in the creation of a Bitcoin system; isn't that correct?

5 A. Yes, completely. Because, as I said, a Bitcoin system, not
6 Bitcoin. It was an exchange and a bank. So I was with
7 Denariuz, with Coin-Exch., with all of these others, working as
8 hard as I could to get the world's first Bitcoin bank.

9 Unlike everyone else, the difference is I didn't go out
10 there and launch going: "Oh, there's all these irregularities
11 with the law." I tried to go to sort of the different banking
12 industries, and I tried to get a banking charter, rather
13 than -- and I tried to get a license and I tried to do that all
14 before. Unlike every other exchange, the bucket shops out
15 there, I tried to actually be fully licensed and compliant
16 before launching to customers. So that's what it is.

17 Q. The W&K Info Defense Research IP would have exposed Satoshi
18 Nakamoto and core blockchain intellectual property. It wasn't
19 banking software, Dr. Wright.

20 A. Is that a question?

21 Q. Oh, yeah.

22 A. Well, no. Actually, it is. If you actually have a look at
23 your other document, it actually says it right on there. It
24 says: "Banking software." It says: "Exchange software." And
25 the whole point of an organization that is launching a Bitcoin

1 bank, the whole purpose of core banking software is core
2 banking. So I mean, it seems really, really simple to me.

3 Q. No one's disputing you had banking software, Dr. Wright.

4 The question is the W&K software exposed Satoshi Nakamoto and
5 core blockchain IP; wasn't exposing banking software, correct?

6 A. No. It was core banking software that I had been
7 modifying. So when you later get on to other documents, like
8 the ones from Temenos, what you will see that we were doing is
9 negotiating with all of the big banking software platforms. We
10 were trying our hardest to build basically a friendly system
11 for Bitcoin, one that would enable the exchange as cash.

12 That's actually harder than people imagine right now
13 because the accounting platforms, and the way that modern
14 banking is done, is very different to the old-fashioned
15 depository system where people actually had physical gold or
16 silver or something like this.

17 So going back -- and some people would say going
18 forwards -- I actually think it's a better thing. I don't like
19 the levels of inflation and the levels of manipulation that
20 central banks do. I want something that is hard money. I want
21 something that constrains government spending. So yes, it is a
22 banking and a Bitcoin banking system.

23 Q. Dr. Wright, November --

24 MR. FREEDMAN: Thank you, Ms. Vela.

25

1 BY MR. FREEDMAN:

2 Q. Dr. Wright, in 2015, your companies' lawyers sought to
3 establish ownership over W&K's IP, correct?

4 A. The way that you're implying is incorrect. Because, as
5 I've been explaining, it is software. So software rights can
6 be distributed and assigned to multiple parties. So unless
7 there is an exclusive agreement where you abstract rights away
8 from the other party, and there is an abeyance -- abeyance
9 being a technical term meaning that you give up all rights --
10 unless you have that document saying: "I forego my rights. I
11 no longer have any right to use this," then both parties end up
12 with rights.

13 Q. And, Dr. Wright, November of 2015, you received a report
14 from Baker & McKenzie. Do you recall that?

15 A. I received several reports from Baker & McKenzie. So I
16 couldn't say on dates. Sorry.

17 Q. And you understand, Dr. Wright, that Baker McKenzie is a
18 massive international law firm with almost 5,000 lawyers
19 across --

20 MS. MCGOVERN: Objection. Objection. Objection, Your
21 Honor.

22 THE COURT: Sustained.

23 BY MR. FREEDMAN:

24 Q. Let's take a look at the report, Dr. Wright.

25 MR. FREEDMAN: Ms. Vela, can you please put up for the

1 witness and counsel P296.

2 BY MR. FREEDMAN:

3 Q. Do you see the name of the firm at the top right corner,
4 Baker McKenzie?

5 A. Yes. At this point, I was no longer a director or officer
6 of the company, though.

7 MR. FREEDMAN: Ms. Vela, can you go to Page 1, please.

8 BY MR. FREEDMAN:

9 Q. And do you see 1.4A?

10 MR. FREEDMAN: Ms. Vela, can you highlight that for
11 Dr. Wright.

12 THE WITNESS: Yes, it was driven by me. As you've
13 already heard me testify multiple times -- well, I've said I'm
14 a slave driver. I know people will call me that. But it's my
15 vision, and so I'm driving people to do my vision, and I'm
16 still proud of it.

17 I'm -- the company I'm with at the moment doesn't want
18 to do an exchange. They don't want to bank. But one day I
19 intend to do this still. I mean, I'm doing a lot of other
20 things at the moment. There's only so much time in the day.
21 And unfortunately, the lawsuit takes up way too much of my
22 time.

23 But again, my vision is very simple. I want a legal
24 global bank. I want something that enables people in South
25 America, who are legally working across areas, to be able to

1 transmit money, to do it cheaply, quickly, without cost. My
2 vision is there. It remains. And I don't care what hurdles
3 keep coming in my way. I'm going to do this or die trying. I
4 will work till I'm 99, and fall over dead or achieve what I'm
5 doing before that. That simple.

6 So this is driven, yes. I have a purpose. And if
7 I -- I will do that and I'm going to achieve that. And I don't
8 care how many obstacles, how many failures. And you'll talk
9 about my failed companies. I don't care. I'll pay back the
10 people who loaned me money. And I'll beg and grovel investors,
11 like he said, again, and I will start again. And if I fail,
12 I'll sell all my stuff, like I said multiple times, and I will
13 start again.

14 So yes, by definition, I think that's driven.

15 MR. FREEDMAN: Ms. Vela, can you go to Page 15 of the
16 document, please.

17 BY MR. FREEDMAN:

18 Q. Dr. Wright, do you see the reference to W&K at 5.1?

19 MS. MCGOVERN: Objection, Your Honor. The document's
20 not in evidence. Object to the reference to the substantive
21 nature of it until it is.

22 THE COURT: It's only being shown to the witness; is
23 that correct?

24 Overruled.

25 MR. FREEDMAN: That is correct, Your Honor.

1 Ms. Vela, could you back to the first page.

2 Your Honor, at this point Plaintiffs offer P296 into
3 evidence.

4 MS. MCGOVERN: Objection, Your Honor. There's been no
5 foundation. This witness did not create this document, draft
6 this document, and there's no testimony to provide for the
7 adequate foundation and hearsay, Your Honor.

8 THE COURT: Overruled. P296 will be admitted into
9 evidence.

10 (Plaintiffs' Exhibit 296 received into evidence.)

11 BY MR. FREEDMAN:

12 Q. Dr. Wright, this time the jury can see it on the screen.
13 So from the law firm of Baker & McKenzie in the top right
14 corner. The document is entitled: "DeMorgan Group
15 Intellectual Property Group Ownership Analysis," dated 27th of
16 November, 2015. Do you see that?

17 A. Yes. I wasn't actually involved in the analysis, but I do
18 see it. I know the company did that.

19 MR. FREEDMAN: Ms. Vela, can you go to the next page,
20 please.

21 One more.

22 And can you zoom into 1.4 first.

23 BY MR. FREEDMAN:

24 Q. Dr. Wright, here Baker & McKenzie's document says: "Much
25 of the work undertaken by the DeMorgan Group to date has been

1 driven by Craig Steven Wright."

2 Do you see that?

3 A. As I just explained, I'm the one who is the vision on all
4 of these things. I'm the one who drives people. I'm the one
5 who basically gives someone a concept that we want achieved.
6 I'm the one who won't stop. I've nearly been stopped multiple
7 times, but I'm not going to. So yes, I'm driven.

8 Q. And then it says: "In this report, Craig Wright, in his
9 personally capacity, and the Wright Family Trust are referred
10 to as the 'Craig Wright entities.'"

11 Do you see that?

12 A. Yes. I see what they called it.

13 MR. FREEDMAN: Ms. Vela, can you zoom out, please.

14 And let's -- yep, please. Can we bring up 1.1.

15 BY MR. FREEDMAN:

16 Q. Dr. Wright, I'm about halfway through this. "DeMorgan
17 Limited is in the process of undertaking investigations to help
18 it identify which intellectual property rights are currently
19 owned by it and certain related entities. The purpose of this
20 report is to assist with this process."

21 Do you see that, Dr. Wright?

22 A. Yeah. I see what they wrote.

23 MR. FREEDMAN: Ms. Vela, can we go to Page 5. And can
24 we highlight 1.7.

25

1 BY MR. FREEDMAN:

2 Q. "As noted" -- sorry -- 1.7 is entitled "Red Flag."

3 "Red Flag Third-Party Issues. As noted above, the purpose
4 of this report is to seek to identify the core intellectual
5 property rights currently owned by the DeMorgan Group entities
6 and Craig Wright group entities. The report does not focus on
7 intellectual properties rights owned by third parties.

8 "However, where the documentation provided to us indicates
9 that DeMorgan Limited believes that there are core intellectual
10 property rights owned by a DeMorgan group entity or Craig
11 Wright entity, and our review of the documentation provided to
12 us indicates a material risk that this is not the case and that
13 the relevant rights may be owned by third parties, we have
14 flagged this issue in the report as a red flag third-party
15 issue."

16 Do you see that?

17 A. Yes, I do. What I believe that they were doing was
18 flagging the fact that some of the entities shared rights with
19 other people. So yes.

20 Q. So in non-lawyer speak, this is saying: "When we find
21 intellectual property that you think you own, but we think you
22 may not own, we're going to flag that for you," right?

23 MS. MCGOVERN: Objection, Your Honor.

24 THE COURT: Sustained.

25 MR. FREEDMAN: Ms. Vela, let's go to Page 15, please.

1 And can we zoom in to "Red Flag Third-Party Issue."

2 There we go. Thank you.

3 BY MR. FREEDMAN:

4 Q. "Red Flag Third-Party Issue. Red flag third-party issues
5 have been identified throughout the report. Where a red flag
6 third-party issue has been raised, we recommend that DeMorgan
7 Limited consider the importance and value of the relevant core
8 intellectual property rights to which the red flag third-party
9 issue relates and the risks associated with leaving the current
10 position as it is.

11 "Where the relevant core intellectual property rights are
12 of a material importance to the ongoing operations of DeMorgan
13 Group, one possibility may be considering whether the relevant
14 third party would be willing to assign the relevant core
15 intellectual property rights to new intellectual property
16 corporation in the appropriate circumstances.

17 "If the third party is unwilling to do so, further
18 consideration of the consequences of this refusal for the
19 DeMorgan Group and DeMorgan Limited's strategy for addressing
20 those consequences will need to be considered."

21 And the very first red flag third-party issue flagged is
22 w&K. "One key third party that appears a number of times in
23 the review material is W&K."

24 Do you see that?

25 A. Yes. I see that they flagged it. Because, as I said, we

1 had software from Siemens, software from Al Baraka, and the
2 changes to that, well, overlapped with other software rights.

3 MR. FREEDMAN: Thank you, Ms. Vela.

4 BY MR. FREEDMAN:

5 Q. Dr. Wright, around that time in late 2015, you received
6 another email from Ira, did you not?

7 A. I don't remember. Sorry.

8 MR. FREEDMAN: Ms. Vela, please put up P301 for the
9 witness and counsel.

10 BY MR. FREEDMAN:

11 Q. Dr. Wright, do you see at the bottom of chain there's an
12 email from Ira Kleiman to yourself asking for something?

13 A. Yes. I see that.

14 MR. FREEDMAN: Your Honor, Plaintiffs offer P301 into
15 evidence.

16 MS. MCGOVERN: Objection, Your Honor. No objection to
17 the email from Ira, but objection to the rest as hearsay, Your
18 Honor.

19 THE COURT: The objection is overruled. It will be
20 admitted into evidence, each of the pages.

21 And it's just the one page; is that correct
22 Mr. Freedman?

23 MR. FREEDMAN: All we want is the one page. Are there
24 any additional pages?

25 THE COURT: May I see the other page or is there --

1 MR. FREEDMAN: Ms. Vela, is there another page to the
2 document?

3 No. It's one page, Your Honor.

4 THE COURT: All right. Admitted into evidence.
5 (Plaintiffs' Exhibit 301 received into evidence.)

6 MR. FREEDMAN: Can we zoom in, please.

7 BY MR. FREEDMAN:

8 Q. Dr. Wright, Ira Kleiman writes you again on December 5th,
9 2015: "Hi. I thought in November Coin-Exch. would hold a
10 meeting and I would finally receive some updates."

11 Do you see that?

12 A. Yes. I see that being that I had resigned as a director
13 and was no longer the CEO of the company, and that I had moved
14 to the UK, that I forwarded this to Stefan Matthews who was at
15 that point the CEO of DeMorgan. So Ira sent me an email and I
16 forwarded it on to the relevant company officer.

17 Q. From your craig.wright@demorgan.com.au email address?

18 A. Yes. I was still employed there.

19 Q. And Mr. Matthews says: "Park this till Monday. No need to
20 respond."

21 Do you see that?

22 A. Yeah. Quite frankly, to put it simply, Stefan didn't think
23 this Ira would be a risk.

24 Q. About a month later, Dr. Wright, you and your companies
25 enter into final agreements to sell all the intellectual

1 property owned by your companies, including Coin-Exch., Hotwire
2 and all the rest we've seen; isn't that correct?

3 A. No. Actually technically, as I said, it was incorrect.

4 The Australian companies kept trading and it was a transfer of
5 rights. So it wasn't an exclusive deal where the intellectual
6 property is removed. So the rights still remained with W&K.
7 The rights still remained with DeMorgan Group. And the rights
8 were also then licensed to an overseas group that did nothing
9 with them.

10 Basically, I wanted -- and I still want to make an
11 exchange, and I want to make a global bank. Unfortunately, so
12 far, I haven't been able to achieve that.

13 MR. FREEDMAN: Ms. Vela, can you please bring up P469
14 for the witness and counsel.

15 It's in evidence, so let's publish, please.

16 BY MR. FREEDMAN:

17 Q. Dr. Wright, we have an IP assignment deed that lists all
18 the companies we've been looking at in Australia and "nCrypt
19 Holdings" at the top. Do you see that?

20 A. I do.

21 MR. FREEDMAN: Let's go to Page 8, please, Ms. Vela.

22 Thank you.

23 BY MR. FREEDMAN:

24 Q. "In consideration for the payment by the purchaser to the
25 vendors" -- we're going to get to who those are -- you can take

1 me for now that purchaser is nCrypt and vendors are your
2 Australian companies -- so: "In consideration for the payment
3 by nCrypt to the Australian companies of the contract amount in
4 accordance with the Clause 4, each of your Australian companies
5 hereby assign to the purchaser absolutely all of the
6 intellectual property rights that it owns as of the effective
7 date, free from any third-party interest, including any and all
8 such intellectual property rights that it owns in the Items and
9 Works identified in the IP schedule."

10 Do you see that, Dr. Wright?

11 A. Yes. And as I've been saying, that doesn't mean what's
12 being implied. What that means very simply is that any
13 third-party rights are warranted.

14 So, for instance, I'm warranting that we own the Al Baraka
15 software, I'm warranting that we own the SCADA software, and
16 I'm warranting that we own all the rest, so no other party can
17 take claim to them or -- yeah.

18 Q. You sold all the intellectual property held by these
19 companies, including the intellectual property that could
20 expose Satoshi Nakamoto and core blockchain IP, correct?

21 A. As I've been saying, yes, I sold the banking software. I
22 sold the exchange software. I hoped those companies would keep
23 building what I wanted to build. They haven't. I'm still
24 trying to convince people of that. I'm still working with
25 other companies to try and do it.

1 I've worked trying to convince people of actually building
2 something that isn't a bucket shop, that isn't a Bitcoin or
3 cryptocurrency exchange where they gamble on price
4 fluctuations, and where they build something that has
5 real-world use, and I'm going to keep trying to do that. I'm
6 going to try and not have cryptocurrency gambling, but rather,
7 digital money.

8 And I don't care. I'm going to keep trying on doing that.
9 That simple.

10 MR. FREEDMAN: Thank you, Ms. Vela.

11 Can you please bring up P871 for the witness and
12 counsel.

13 Can you zoom in on all of the text in the email chain,
14 just starting from "nCrypt Craig" all the way down to the end.

15 No. No. No. No. All the way from -- yeah. Thank
16 you.

17 BY MR. FREEDMAN:

18 Q. Dr. Wright, do you see this is an email from yourself to
19 Ms. Watts and Mr. Matthews?

20 A. It says: "NCrypt Craig." It doesn't say me and I don't
21 recognize it.

22 Q. You recall testifying that emails from nCrypt Craig were
23 from you?

24 A. There was some, and there were also ones that were by other
25 staff members.

1 Q. And do you see that there's a mention from Mr. Matthews
2 about patents and then you respond?

3 A. So what you're saying there is: "NCrypt Craig," but that's
4 not what I said. Craig@ncrypt is not the same thing. So --
5 and no, I don't -- actually don't recollect it.

6 MR. FREEDMAN: Your Honor, Plaintiffs offer P781 into
7 evidence.

8 MS. MCGOVERN: Objection, Your Honor. Hearsay.
9 Foundation.

10 THE COURT: Is that the only page? Can you go down?
11 (Pause in proceedings.)

12 THE COURT: Is it two pages?

13 MR. FREEDMAN: Are there any other pages to the
14 document? How many pages is the document?

15 There are five pages. There are five pages, Your
16 Honor.

17 (Pause in proceedings.)

18 THE COURT: Go to the next page, please.

19 Is the objection on grounds of hearsay?

20 MS. MCGOVERN: Yes, Your Honor.

21 THE COURT: The objection is overruled.

22 MS. MCGOVERN: And foundation, Your Honor. He didn't
23 recognize the document.

24 THE COURT: Overruled. It will be admitted into
25 evidence.

1 (Plaintiffs' Exhibit 781 received into evidence.)

2 MR. FREEDMAN: Can you please zoom into the text on
3 that first page, please, Ms. Vela.

4 BY MR. FREEDMAN:

5 Q. Dr. Wright, the bottom of the email chain on this page is
6 an email from Lawrence Adrian at Baker McKenzie. Do you see
7 that?

8 A. See it. Don't recognize it.

9 Q. And he says: "Outside the DeMorgan Group documentation, we
10 are still awaiting signature of following our email yesterday,
11 the W&K IP assignment deed to be signed by Uyen."

12 Do you see that?

13 A. I do for the first time, yes.

14 Q. Despite waiting for signatures from W&K, Mr. Matthews
15 responds with an email to you saying: "All clear. Onward with
16 the patent program and filing now," smiley face. Do you see
17 that?

18 A. No. There's no -- it's not forwarded to me.

19 Q. Dr. Wright, you then respond from your nCrypt Craig email
20 account: "Good," with a cc to Ms. Watts, your wife, correct?

21 A. No. Again, there are more than one person in my companies
22 and ones that I've founded. So "nCrypt Craig" doesn't mean
23 craig@ncrypt. It doesn't say: "Craig.wright." So
24 unfortunately, no.

25 Q. Dr. Wright --

1 MR. FREEDMAN: Thank you, Ms. Vela.

2 BY MR. FREEDMAN:

3 Q. Dr. Wright, during this period, nCrypt, nChain -- nChain
4 maintained a list of patents applications and a spreadsheet,
5 correct?

6 A. No. They're two separate companies.

7 Q. Did nCrypt or nChain maintain a patent application registry
8 in a spreadsheet?

9 A. I have no idea what nCrypt did -- and nChain were a
10 separate company that bought the rights out from Mr. MacGregor.

11 Q. Did nChain or nCrypt maintain a patent application master
12 registry in an Excel document?

13 A. I have no idea. I was never involved in any Excel document
14 from nCrypt.

15 MR. FREEDMAN: Ms. Vela, please play clip number 58
16 from the deposition of Craig Wright, March 18th, 2020.

17 For the record, Page 51, lines 13 through 16.

18 (Video played.)

19 MR. FREEDMAN: Ms. Vela, can you please play clip 53
20 Dr. Wright's March 18th, 2020 deposition.

21 That's for the record, pages 51, line 22, through page
22 52, line 7.

23 (Video played.)

24 BY MR. FREEDMAN:

25 Q. Does that help you remember that there was a patent

1 spreadsheet, Dr. Wright?

2 A. Like I've just said in both of these, nChain did. So the
3 person in charge of patenting nChain, the later company, had a
4 patent spreadsheet. Alan Pederson was employed by DeMorgan.
5 DeMorgan had spreadsheets. But as I said, I don't know exactly
6 everything Alan was doing. He was the person in charge of like
7 the PMO office. Project management. He maintained all of that
8 and ran it.

9 The other company, when you said nChain or nCrypt, I'm very
10 pedantic on these things, and that is one or the other. So one
11 of those companies did. NCrypt, I don't know. So very simply,
12 I don't know if they're talking about nCrypt.

13 Q. You are the chief scientist of nChain, Dr. Wright, correct?

14 A. NChain is not nCrypt. But I am, yes.

15 MR. FREEDMAN: Ms. Vela, can you please bring up P865
16 for the witness and counsel? And can we go to Page 5, please.

17 Hold on before we move forward.

18 BY MR. FREEDMAN:

19 Q. Dr. Wright, do you see this is an email from Alan Pederson,
20 the individual you said tracks all these things and is a good
21 project manager, to craig@ncrypt.com, stefan@ncrypt.com,
22 ramona@ncrypt.com. Do you see that?

23 A. Yeah. I see the document.

24 MR. FREEDMAN: Ms. Vela, can we go to Page 5.

25

1 BY MR. FREEDMAN:

2 Q. And attached to that document is an Excel spreadsheet. Do
3 you see that, Dr. Wright?

4 A. You would need to zoom in a little bit on the details.

5 MR. FREEDMAN: Ms. Vela, can you zoom in for
6 Dr. Wright.

7 BY MR. FREEDMAN:

8 Q. Can you read on the top where it says -- the very top line.

9 A. Yes I recognize this as the sort of thing that Alan used to
10 do.

11 MR. FREEDMAN: Your Honor, Plaintiffs offer P685 into
12 evidence.

13 MS. MCGOVERN: Objection, Your Honor. Relevance.
14 Hearsay.

15 THE COURT: Overruled. Admitted into evidence.

16 (Plaintiffs' Exhibit 685 received into evidence.)

17 MR. FREEDMAN: Ms. Vela, can we go to Page 5, please.

18 BY MR. FREEDMAN:

19 Q. Dr. Wright --

20 MR. FREEDMAN: And, Ms. Vela, can you call out the
21 very first line on the Excel spreadsheet that's been attached
22 to the email.

23 BY MR. FREEDMAN:

24 Q. Dr. Wright, this is the patent's progress and
25 prioritization spreadsheet, correct?

1 A. That's what it says.

2 MR. FREEDMAN: Ms. Vela, you can minimize that,
3 please.

4 BY MR. FREEDMAN:

5 Q. And, Dr. Wright, this registry shows that -- this document
6 shows that, as of 2016, over 200 patents that are held by
7 nCrypt were sourced from your Australian companies?

8 A. No. We started actually writing them then. That sounds a
9 lot. But before this court case that has slowed me down, I've
10 written 3,208 patents. The last year, from February to
11 February -- and I have it all documented. I've got tracking
12 software -- I wrote a total of 6.4 million words.

13 Now, this seems a lot. The simple answer is: In four
14 years, I created 3,208 patents. They'll end up more than that.
15 So on a good day, I've written the equivalent of a master's
16 thesis. It sounds strange and sounds unbelievable.

17 As I'm doing this trial, I'm enrolled in 19 different
18 universities doing degrees. Not kidding. One of those is
19 Harvard. So they're not all low-end universities. Some are.

20 Before this, I was enrolled, at my peak, in 25. I'm doing
21 five different doctorates simultaneously. On top of that, I'm
22 working.

23 So in a matter of months, I wrote 200 documents, as
24 unbelievable to some people as that seems. And the simple fact
25 is, shortly afterwards, I continued, and I still do. I

1 actually wrote three papers last night.

2 MR. FREEDMAN: Ms. Vela, can you zoom in to the green
3 box, please, on the patent spreadsheet.

4 BY MR. FREEDMAN:

5 Q. Dr. Wright, those are your Australian companies and
6 yourself, correct?

7 A. Yes. They were the ones going to actually do some patent
8 work. They didn't.

9 Q. And this shows that the patents per company entity total
10 209 patents from your Australian entities. Do you see that?

11 A. Again, no. This is areas that would be used by those
12 different companies.

13 The nCrypt patent portfolio would then license back to my
14 Australian companies in the different areas. So where your
15 seeing Zhul, that is the equivalent of Coursera. I wanted to
16 do something like that.

17 Where you're seeing "Interconnected Research," this was
18 online corporate development of basically methodologies to
19 allow individuals in different areas to work together on
20 projects, et cetera.

21 When you're looking at Denariuz, that was the banking
22 software. When you're looking at Coin-Exch, exchange -- so
23 patents per company entity is the other way round.

24 I wanted to keep the Australian entitles going. So no,
25 these weren't doing it. I was working at that stage for the

1 British company and doing it, and it was going to be used the
2 other way. I still wanted the Australian companies to operate.

3 Q. The same companies that you transferred all the
4 intellectual property from to nCrypt, they are now filing
5 patents with that intellectual property; isn't that right?

6 A. No. And this is very, very easy to check. The way that
7 patents and are done is all public. So when you file, all of
8 this is easily checked. So it's not about spreadsheets about
9 what someone says these are. You go to the patent filing and
10 you look at the owner. It's public. This is how patents work.
11 It's a public record.

12 We did keep them -- there's an 18-month secrecy window. So
13 if you file a patent, you don't need to tell the world about it
14 for 18 months. But after that 18 months, the monopolistic
15 protection you get on a patent that you had for 20 years, if
16 you're granted, means that you give up and make public your
17 knowledge, no trade secrets, no one gets to know what you're
18 doing. The secret source how you're creating all these things
19 is given to the world, so that after the patent expires the
20 world can use it and anyone outside of the jurisdictions can
21 use it.

22 So, very simply, if you want to know who owns these, you go
23 to the patent register and you find it's the other way around.

24 MR. FREEDMAN: Ms. Vela, could you please put up P457.

25 THE COURT: Mr. Freedman, let me know when it might be

1 a good time for us to break for lunch.

2 MR. FREEDMAN: I can stop now or in about six minutes.

3 THE COURT: Why don't we stop now?

4 All right. Ladies and Gentlemen, let's take a
5 one-hour recess for lunch and I'll see you back here at 2:00.

6 (Jury not present, 1:01 p.m.)

7 THE COURT: All right. Just for purposes of timing,
8 how much longer do you believe you have, sir?

9 MR. FREEDMAN: Your Honor, about six minutes left to
10 this, and then maybe about 20 minutes on another thing. And
11 I've got to go through all the documents because we can't agree
12 to admit them. That could take a while.

13 THE COURT: Do you believe this is going to take your
14 direct examination through the day?

15 MR. FREEDMAN: That depends on Dr. Wright's answers,
16 Your Honor.

17 THE COURT: I'm just --

18 MR. FREEDMAN: I hope not, but our next witness is
19 here and ready to testify. Dr. Edman is here.

20 THE COURT: All right. And, Ms. McGovern, with regard
21 to any cross-examination, do you anticipate doing that in the
22 Plaintiffs' case?

23 MS. MCGOVERN: Your Honor, at this point, we do not.
24 If I could please reserve, so I can confer with my team.

25 THE COURT: Of course. Of course. And I don't want

1 to hold you to it. I'm just trying to make sure that we don't
2 have unnecessary gaps in time, okay?

3 Have a nice lunch. I'll see you back here at 2:00.

4 (Recess from 1:02 p.m. to 2:03 p.m.)

5 THE COURT: All right. Welcome back. Is there
6 anything we need to address before we continue?

7 MR. FREEDMAN: I just need a lavalier.

8 THE COURT: Go ahead and take one, Mr. Freedman.

9 Ms. McGovern, anything on behalf of the Defendant?

10 MS. MCGOVERN: I'm just going to grab --

11 THE COURT: Of course.

12 If that's all the partes need, let's go ahead and
13 bring in the jury.

14 (Before the Jury, 2:04 p.m.)

15 THE COURT: All right. Welcome back, ladies and
16 gentlemen. Please be seated. I trust that each of you had a
17 pleasant lunch and are ready to get back to work.

18 We'll continue with the questioning.

19 DIRECT EXAMINATION [CONTINUED]

20 BY MR. FREEDMAN:

21 Q. Good afternoon, Dr. Wright.

22 A. Good afternoon, Mr. Freedman.

23 Q. Before lunch, Dr. Wright, we were tracing the intellectual
24 property and various transactions that related to it. Do you
25 recall that?

1 A. We weren't actually tracing intellectual property. We were
2 looking at the different corporations and different licensing
3 agreements. So it's not actually correct that it's tracing it.

4 Q. Acquisition agreements?

5 A. Not the way that you're implying, no. You're actually
6 incorrect, like you were saying with the patents, the wrong way
7 around.

8 Q. Dr. Wright, in 2016 Baker McKenzie found that by 2017 the
9 intellectual property would be worth as much as 1.9 billion
10 pounds.

11 MS. MCGOVERN: Objection.

12 BY MR. FREEDMAN:

13 Q. Isn't that correct?

14 MS. MCGOVERN: Objection. Misstates the evidence.

15 THE COURT: Overruled.

16 THE WITNESS: I have no idea. I had nothing to do
17 with any of that and I've never seen a \$1.9 billion valuation.

18 MR. FREEDMAN: Ms. Vela, can you please put up P457,
19 which is in evidence.

20 BY MR. FREEDMAN:

21 Q. Dr. Wright, "Baker McKenzie IP Valuation Analysis."

22 MR. FREEDMAN: Ms. Vela, can you bring us to Page 10.

23 BY MR. FREEDMAN:

24 Q. Dr. Wright, on the bottom left corner --

25 MR. FREEDMAN: Ms. Vela, can you make that pop out for

1 us.

2 Oh, that works.

3 BY MR. FREEDMAN:

4 Q. "The table below shows the range of estimated values based
5 on EITC filing 206 patents by 2017." Upper core tile, do you
6 see "Maximum value combined set 1,957,000,000 pounds"?

7 A. I haven't seen this document before.

8 MR. FREEDMAN: Ms. Vela, can you please bring us to
9 the next page.

10 And one more.

11 Again.

12 One more time.

13 There we go.

14 BY MR. FREEDMAN:

15 Q. Dr. Wright, isn't it true --

16 MR. FREEDMAN: Ms. Vela, can you bring us -- yeah.

17 Thank you.

18 BY MR. FREEDMAN:

19 Q. Dr. Wright, Baker McKenzie concluded that by 2018 the upper
20 value estimate for the intellectual property we are tracing
21 would be worth \$2,614,000,000?

22 A. No idea. I haven't seen the document before.

23 Q. That was 2018, right, Dr. Wright?

24 A. Don't know. I haven't investigated this document before.

25 MR. FREEDMAN: Ms. Vela, can you highlight 2018.

1 Thank you.

2 BY MR. FREEDMAN:

3 Q. Dr. Wright, the intellectual property has gone up in value
4 since 2018, hasn't it?

5 A. No idea. I haven't valued it.

6 MR. FREEDMAN: Ms. Vela, can you take that down.

7 BY MR. FREEDMAN:

8 Q. Dr. Wright, isn't it true that the intellectual property
9 within this case that you claim to own is worth around \$252
10 billion today?

11 A. That's not actually what I said.

12 MR. FREEDMAN: Ms. Vela, can you please put up what
13 we'll mark as Impeachment Exhibit RF-6 for counsel and the
14 Court.

15 MS. MCGOVERN: Objection. Improper impeachment.

16 THE COURT: This is a joint exhibit?

17 MR. FREEDMAN: This is not, Your Honor. This is the
18 exhibit the Court addressed based on a timing issue and allowed
19 it to be used for impeachment.

20 MS. MCGOVERN: I restate our objection. It is
21 improper impeachment because he stated that's not what he said.

22 THE COURT: The objection is overruled.

23 You may continue.

24 MR. FREEDMAN: Can you please publish to the jury.

25

1 BY MR. FREEDMAN:

2 Q. Dr. Wright, we have looked at this Slack channel before,
3 and you have testified that you are the only person that posts
4 from the CSW account.

5 On October 30th, 2021, two days before you started trial in
6 this case, you posted: "Technically, the full value of the
7 intellectual property that I own that is in use within Bitcoin
8 is valued at around \$252 billion." And then you say: "This is
9 the intellectual property within the Kleiman case."

10 MS. MCGOVERN: Objection.

11 BY MR. FREEDMAN:

12 Q. Isn't that correct, Dr. Wright?

13 MS. MCGOVERN: Objection, Your Honor. Improper lay
14 opinion.

15 THE COURT: I'm sorry? Improper lay opinion?

16 MS. MCGOVERN: Yes. Improper lay opinion used as
17 expert testimony, Your Honor. Also hearsay.

18 THE COURT: It is used for impeachment purposes.
19 Overruled.

20 THE WITNESS: No. What this was, is a discussion of
21 passing off. So what I have claimed is that the passing off of
22 BTC as Bitcoin, which radically changes the protocol I created,
23 leaves a lot of companies exposed, including Coinbase,
24 including the core developers, including the others. So during
25 this case I've actually had my lawyer send out letters.

1 Now, the bit you're mistaking is the intellectual
2 property that we're talking about. The true intellectual
3 property that is being impinged upon is the passing-off rights
4 to the name of Bitcoin.

5 Now, to basically say how that works is the original
6 concept of Bitcoin that I created in the whitepaper, that I
7 launched as digital cash, there are people now with Taproot,
8 including mixers. Now, mixers are a way of allowing money
9 laundering. As the issuer of Bitcoin, I have a right to
10 determine what happens with the protocol in the database. So
11 no one has asked me, no one has licensed me, no one has done
12 anything else. So the potential here is in damages claims in a
13 lawsuit against all of those companies.

14 So you're misrepresenting what the intellectual
15 property is in this, basically, attempted impeachment.

16 BY MR. FREEDMAN:

17 Q. Do you deny you said the words that are highlighted on this
18 page, Dr. Wright?

19 A. No. But as I said, this is not what you're claiming it to
20 be. That's the difference. It's not about patents. It's not
21 about software. It's about the rights to effectively the
22 Bitcoin name and database.

23 Now, the argument is that Bitcoin was released under an MIT
24 open source license. The distinction is that the database
25 wasn't. When I ran those nodes in 2009, I didn't put the

1 database at any point on the SourceForge database. Meaning
2 that the database behind Bitcoin was never licensed open
3 source. It is available for copy and use under a set protocol.
4 The one that I set in 2010 Bitcoin is set in stone.

5 By saying Bitcoin is set in stone, as the issuer, creator
6 and developer of the system, I have said you cannot change my
7 protocol. Not it's a community project. I have never once
8 said it's a community project. I said: "This is available to
9 everyone to use." Not to change.

10 Going out there and changing my protocol and
11 misrepresenting fraudulently what it is, including companies
12 like Coinbase, leaves them open to lawsuits. None of which
13 goes to me.

14 Q. The intellectual property within the Kleiman case is worth
15 \$252 billion?

16 MS. MCGOVERN: Objection, Your Honor. Asked and
17 answered.

18 THE COURT: Sustained.

19 MR. FREEDMAN: Thank you, Ms. Vela.

20 BY MR. FREEDMAN:

21 Q. Dr. Wright, just so you know where I'm going with this, I'm
22 going to show you a variety of documents, agreements, that took
23 place within the transactions we were looking at before.

24 MR. FREEDMAN: Ms. Vela, can you put P230 on the
25 screen for Plaintiff -- for the witness and counsel.

1 And can you go to the first page of the document.

2 No. P230.

3 Thank you.

4 Can you go to the first page of the document that's
5 attached.

6 Can you just go to the next page, please.

7 BY MR. FREEDMAN:

8 Q. Dr. Wright --

9 MR. FREEDMAN: Ms. Vela, can you show Page 16, please.

10 BY MR. FREEDMAN:

11 Q. This is your signature, Dr. Wright?

12 A. It is.

13 MR. FREEDMAN: Ms. Vela, can you go back to Page 2.

14 BY MR. FREEDMAN:

15 Q. Dr. Wright, "Doctor of Technologies in DeMorgan." Were the
16 entities listed on the binding term sheet we looked at earlier?

17 A. Could have been, but it's not "doctor." It's "DR."

18 Q. Okay.

19 MR. FREEDMAN: Plaintiffs offer P230 into evidence.

20 MS. MCGOVERN: Objection, Your Honor. Hearsay.
21 Relevance.

22 THE COURT: Overruled.

23 (Plaintiffs' Exhibit 230 received into evidence.)

24 MR. FREEDMAN: Thank you, Ms. Vela.

25 Can you please put up P308 for the witness and

1 counsel.

2 BY MR. FREEDMAN:

3 Q. Dr. Wright, again, this is an IP assignment deed between
4 nCrypt and DeMorgan?

5 MR. FREEDMAN: And, Ms. Vela, can you go to Page 4.

6 BY MR. FREEDMAN:

7 Q. Your signature on the bottom, Dr. Wright?

8 A. Yes, it is.

9 MR. FREEDMAN: Plaintiffs offer P308 into evidence.

10 MS. MCGOVERN: Objection, Your Honor. Relevance,
11 foundation, hearsay.

12 THE COURT: Overruled. Admitted into evidence.

13 (Plaintiffs' Exhibit 308 received into evidence.)

14 MR. FREEDMAN: Ms. Vela, can you please bring up P310.

15 BY MR. FREEDMAN:

16 Q. Dr. Wright, this is an assignment deed between yourself and
17 nCrypt Holdings.

18 MR. FREEDMAN: Ms. Vela, can you please bring us to
19 Page 18.

20 BY MR. FREEDMAN:

21 Q. Dr. Wright, that's your signature on the top right corner
22 of the document?

23 A. I'd need to see the rest of the document to make sure.

24 MR. FREEDMAN: Your Honor, Plaintiffs offer P310 into
25 evidence.

1 MS. MCGOVERN: Objection, Your Honor. Foundation,
2 relevance, hearsay.

3 THE COURT: Can you go back to the signature?

4 MR. FREEDMAN: Ms. Vela, please take us to Page 18.

5 THE COURT: Would you like to ask the question again?

6 BY MR. FREEDMAN:

7 Q. Dr. Wright, is that your signature?

8 A. It actually doesn't look like my signature.

9 Q. That's not what I asked, Dr. Wright. Is it your signature
10 on the document?

11 A. I would need to check the document. I can't answer that
12 because it doesn't look like my signature.

13 Q. What page would you like to see, Dr. Wright?

14 A. All of them. If I'm going to look at a document and say
15 that's my document, I want to see the document.

16 MR. FREEDMAN: Ms. Vela, can you start at the
17 beginning and show Dr. Wright each page of the document.

18 (Pause in proceedings.)

19 MR. FREEDMAN: Tell us when you're ready to go to the
20 next page.

21 THE WITNESS: Next.

22 MS. MCGOVERN: Your Honor, we understand he wants to
23 go through this quickly, but I think Dr. Wright has the right
24 to just review the document as he needs to.

25 THE COURT: Yes. The witness has asked to review it

1 and I believe that's why we're going through the 16 pages.

2 MS. MCGOVERN: I just want to make sure he has the
3 right to be able to do that.

4 THE WITNESS: Next.

5 Next.

6 Next.

7 Next.

8 Next.

9 Next.

10 Next.

11 Excuse me.

12 Next.

13 Next.

14 Next.

15 Next.

16 Next.

17 Next.

18 And next.

19 I recognize the document, but it doesn't look like my
20 signature.

21 MR. FREEDMAN: Plaintiffs offer P310 into evidence,
22 Your Honor.

23 MS. MCGOVERN: Your Honor, we object for lack of
24 foundation and the absence of relevance to this case.

25 THE COURT: Overruled.

1 MS. MCGOVERN: And hearsay.

2 THE COURT: 310 will be admitted into evidence.

3 (Plaintiffs' Exhibit 310 received into evidence.)

4 MR. FREEDMAN: Ms. Vela, can you please put up P315.

5 BY MR. FREEDMAN:

6 Q. Dr. Wright, this is another agreement between DR
7 Technologies, nCrypt, and DeMorgan, the parent company for the
8 R&D.

9 MR. FREEDMAN: And, Ms. Vela, can you please bring us
10 to Page 28.

11 BY MR. FREEDMAN:

12 Q. Dr. Wright, is that your signature on the bottom?

13 A. Again, it doesn't actually look like my signature.

14 MR. FREEDMAN: Plaintiffs offer P315 into evidence.

15 MS. MCGOVERN: Relevance, foundation, hearsay, Your
16 Honor.

17 THE COURT: The objection is noted. It's overruled.
18 Admitted into evidence.

19 (Plaintiffs' Exhibit 315 received into evidence.)

20 MR. FREEDMAN: Ms. Vela, can you please bring up P337.

21 BY MR. FREEDMAN:

22 Q. Dr. Wright, you recognize this as an email from Stefan
23 Matthews with his DeMorgan email group to Ramona Watts of
24 DeMorgan attaching meeting minutes?

25 A. No, I don't.

1 MR. FREEDMAN: Ms. Vela, can you please bring us to
2 Page 9.

3 BY MR. FREEDMAN:

4 Q. Dr. Wright, is that your signature on the bottom left
5 corner signed and sealed by Panoptcrypt?

6 A. That doesn't look remotely like my signature.

7 Q. See your signature up above that, Misfit Games PTY, Ltd?

8 A. No, I don't, actually. It doesn't have Craig S. Wright.
9 It's Craig V., with a C at the end, and that's --

10 Q. And your wife's signature across the right-hand side of the
11 document?

12 A. Doesn't look that much like hers, to tell you the truth,
13 either.

14 MR. FREEDMAN: Your Honor, Plaintiffs offer P337 into
15 evidence.

16 MS. MCGOVERN: Foundation, relevance, hearsay, Your
17 Honor.

18 THE COURT: It's noted. Overruled.

19 Admitted into evidence.

20 (Plaintiffs' Exhibit 337 received into evidence.)

21 MR. FREEDMAN: Ms. Vela, can you please bring up P398.

22 BY MR. FREEDMAN:

23 Q. Dr. Wright, you recognize this as an agreement between
24 yourself and nCrypt to control various intellectual property?

25 MR. FREEDMAN: Ms. Vela, can you show Dr. Wright his

1 signature on Page 3.

2 BY MR. FREEDMAN:

3 Q. Is that your signature, Dr. Wright?

4 A. No. That one's not.

5 Q. And Mr. Pederson's signature right below that as a witness?

6 A. No. I don't recognize it. Sorry.

7 Q. And it's signed for nCrypt, Limited, the company that
8 bought the intellectual property?

9 A. Don't know an M. Farnworth.

10 MR. FREEDMAN: Your Honor, Plaintiffs offer P398 into
11 evidence.

12 MS. MCGOVERN: Objection, Your Honor. Hearsay,
13 foundation, relevance.

14 THE COURT: The objection is noted. It's overruled.
15 Admitted into evidence, 398.

16 (Defendants' Exhibit 398 received into evidence.)

17 MR. FREEDMAN: Ms. Vela, can you please bring up P058.

18 BY MR. FREEDMAN:

19 Q. Dr. Wright, I'm now switching to emails that you have sent,
20 just so you know where I'm going.

21 MR. FREEDMAN: P058, Ms. Vela.

22 THE COURT: P58?

23 MR. FREEDMAN: P059. Sorry. I completely misstated
24 that. But P059.

25

1 BY MR. FREEDMAN:

2 Q. Dr. Wright, do you see this is an email from yourself to
3 John Chesher and Ramona Watts?

4 A. It looks like one of them. I don't recall it fully, but
5 it's my email address.

6 Q. And it appears to be forwarding email messages from Dave
7 Kleiman?

8 A. Yes. This was a conversation about my divorce.

9 MR. FREEDMAN: Plaintiffs offer P059 into evidence.

10 MS. MCGOVERN: No objection, Your Honor.

11 THE COURT: Admitted into evidence.

12 (Plaintiffs' Exhibit 059 received into evidence.)

13 BY MR. FREEDMAN:

14 Q. Dr. Wright, are these legitimate messages between yourself
15 and Dave Kleiman?

16 MS. MCGOVERN: Objection, Your Honor.

17 THE COURT: The basis?

18 MS. MCGOVERN: 403, Your Honor, referring to
19 legitimate emails between the two of them.

20 THE COURT: Do you understand the question, sir?

21 THE WITNESS: I do understand it.

22 THE COURT: The objection is overruled.

23 THE WITNESS: I don't know. I know I had a
24 conversation about my divorce with Dave. I can't remember all
25 the details.

1 MR. FREEDMAN: Thank you, Ms. Vela.

2 Can you please bring up P134.

3 BY MR. FREEDMAN:

4 Q. Dr. Wright, do you recognize this as an email from yourself
5 to Ira Kleiman forwarding emails that purport to be from his
6 deceased brother Dave Kleiman?

7 A. I remember I sent the Integryrs and Information Defense
8 filings to say what I was doing to Dave because I wanted him to
9 be part of one of my companies. He didn't ever accept. But I
10 mean, I don't remember the actual sending, but I know I did
11 send stuff to him.

12 MR. FREEDMAN: Your Honor, Plaintiffs offer P134 into
13 evidence.

14 MS. MCGOVERN: No objection, Your Honor.

15 THE COURT: Admitted into evidence.

16 (Defendants' Exhibit 134 received into evidence.)

17 BY MR. FREEDMAN:

18 Q. Dr. Wright, is this a legitimate email between you and Dave
19 Kleiman?

20 A. I know I forwarded emails to Dave. That's all I can say.

21 MR. FREEDMAN: Ms. Vela, can you please bring up P140.

22 BY MR. FREEDMAN:

23 Q. Dr. Wright, do you recognize this as an email between
24 yourself, Andrew Sommer -- from your lawyer in Australia -- and
25 Ramona Watts, your wife, and do you see that W&K is mentioned

1 in this email, Dr. Wright?

2 A. Yes, I see this.

3 MR. FREEDMAN: Your Honor, Plaintiffs offer P140 into
4 evidence.

5 MS. MCGOVERN: No objection.

6 THE COURT: Admitted into evidence.

7 (Plaintiffs' Exhibit 140 received into evidence.)

8 MR. FREEDMAN: Ms. Vela, can you please bring up P142.

9 BY MR. FREEDMAN:

10 Q. Dr. Wright, do you recognize this as an email between
11 yourself, John Chesher, Ramona Watts and Andrew Sommer where
12 W&K is mentioned in the top of the email?

13 A. I see.

14 MR. FREEDMAN: Your Honor, Plaintiffs offer P142 into
15 evidence.

16 MS. MCGOVERN: No objection.

17 THE COURT: Admitted into evidence.

18 (Plaintiffs' Exhibit 142 received into evidence.)

19 MR. FREEDMAN: Ms. Vela, can you please bring up P209.

20 BY MR. FREEDMAN:

21 Q. Dr. Wright, do you recognize this as an email from yourself
22 to Andrew Sommer and his response? Do you see it's talking
23 about DeMorgan, Limited and Bitcoin?

24 A. Yes. I see communications with the company lawyer about
25 structuring.

1 MR. FREEDMAN: Your Honor, Plaintiffs offer P209 into
2 evidence.

3 MS. MCGOVERN: No objection.

4 THE COURT: Admitted into evidence.

5 (Plaintiffs' Exhibit 209 received into evidence.)

6 MR. FREEDMAN: Ms. Vela, can you please bring up P210.

7 BY MR. FREEDMAN:

8 Q. Dr. Wright, do you recognize this as an email from Stefan
9 Matthews, including a conversation, a Skype transcript clip --
10 I'm in the subject of the email -- between you and
11 Mr. Matthews?

12 A. It says it's a Skype -- I mean, I don't recognize it as
13 that, but I could have sent those things. I do. And Stefan
14 could have as well.

15 MR. FREEDMAN: Your Honor, Plaintiffs offer P210 into
16 evidence.

17 MS. MCGOVERN: Objection, Your Honor. Hearsay,
18 foundation, relevance.

19 THE COURT: The objection is sustained at this point.

20 Let's lay the necessary foundation.

21 BY MR. FREEDMAN:

22 Q. Dr. Wright, do you see the email at the top is an email
23 from Calvin Ayre to you forwarding on the transcript?

24 A. I see that he cc'd me.

25 Q. And the transcript below from Skype is -- I believe you

1 just testified, is things that you could have said but you do
2 not recall?

3 A. That's correct.

4 MR. FREEDMAN: Your Honor, Plaintiffs offer P210 into
5 evidence.

6 THE COURT: All right.

7 MS. MCGOVERN: Same objection, Your Honor.

8 THE COURT: The objection is overruled.

9 It will be admitted into evidence.

10 (Plaintiffs' Exhibit 210 received into evidence.)

11 MR. FREEDMAN: Ms. Vela, can you please bring up P211.

12 BY MR. FREEDMAN:

13 Q. Dr. Wright, do you recognize this as an email from yourself
14 providing keys -- sorry.

15 Do you recognize this as an email from yourself providing
16 Bitcoin-related things to Mr. Matthews and others?

17 A. No. No, I don't, as that -- what you just said is not
18 correct.

19 Q. Dr. Wright, do you see the second line where Bitcoin is
20 referenced?

21 A. I see the second line, yes.

22 Q. Do you see the third line where you talk about Bitcoin
23 wallets?

24 A. I see the second line there and the third line.

25 Q. And the third line you talk about wallet and keys?

1 A. I see all of that.

2 MR. FREEDMAN: Your Honor, Plaintiffs offer P211 into
3 evidence.

4 MS. MCGOVERN: Objection, Your Honor. Hearsay,
5 relevance, foundation.

6 THE COURT: I think you need to ask the question again
7 with regard to the document, whether it's recognized.

8 BY MR. FREEDMAN:

9 Q. Dr. Wright, you had an email address craig@rcjbr.org?

10 A. I did.

11 Q. And you sent this email?

12 A. Well, no, I received that email from Calvin.

13 Q. Talking about the one that's highlighted. You sent that --

14 A. I sent an email. Let's see. I was trying to negotiate
15 with Calvin Ayre to basically put money into the company and
16 give me a loan where Bitcoin would back it up. Unfortunately,
17 that never went through. So I remember those negotiations.

18 MR. FREEDMAN: Your Honor, Plaintiffs offer P211 into
19 evidence.

20 THE COURT: The objection is overruled.

21 It will be admitted into evidence.

22 (Plaintiffs' Exhibit 211 received into evidence.)

23 MR. FREEDMAN: And, Ms. Vela, can you please bring up
24 P213.

25

1 BY MR. FREEDMAN:

2 Q. Dr. Wright, this is an email from yourself to Mr. Matthews.
3 You're talking about a paper Bitcoin wallet. Do you see that?

4 A. No. It's an email from myself to Calvin Ayre and cc'd to
5 the others.

6 Q. That is correct, Dr. Wright. As well as to your wife,
7 correct?

8 A. Yes.

9 MR. FREEDMAN: Your Honor, Plaintiffs offer P213 into
10 evidence.

11 MS. MCGOVERN: Objection, Your Honor. Foundation and
12 relevance.

13 THE COURT: Overruled. Admitted into evidence.

14 (Plaintiffs' Exhibit 213 received into evidence.)

15 MR. FREEDMAN: Ms. Vela, can you please bring up P214.

16 BY MR. FREEDMAN:

17 Q. Dr. Wright, do you recognize this as an email from yourself
18 to Mr. Matthews, Ramona Watts, Andrew Sommer, and some others
19 and in it you discuss a paper wallet?

20 A. Yes.

21 MR. FREEDMAN: Your Honor, Plaintiffs offer P214 into
22 evidence.

23 MS. MCGOVERN: No objection.

24 THE COURT: Admitted into evidence.

25 (Plaintiffs' Exhibit 214 received into evidence.)

1 MR. FREEDMAN: Ms. Vela, can you please bring up P215.

2 BY MR. FREEDMAN:

3 Q. Dr. Wright, do you recognize this as an email from yourself
4 to a few individuals, including Stefan Matthews and Andrew
5 Sommer?

6 A. Yes.

7 Q. And in it you mention Bitcoin and your history?

8 A. Yes.

9 MR. FREEDMAN: Your Honor, Plaintiffs offer P215 into
10 evidence.

11 MS. MCGOVERN: No objection.

12 THE COURT: Admitted into evidence.

13 (Plaintiffs' Exhibit 215 received into evidence.)

14 MR. FREEDMAN: Ms. Vela, can you please put up P219.

15 Your Honor, I'm happy to keep going through these, but
16 if Ms. McGovern will withdraw objections we might be able to
17 get through it a lot quicker.

18 MS. MCGOVERN: I'd like you to lay the foundation, as
19 I explained earlier, Vel.

20 THE COURT: All right. Let's continue.

21 BY MR. FREEDMAN:

22 Q. All right. Dr. Wright, do you recognize this as an email
23 between yourself and Mr. Ayre attaching documents prepared by
24 yourself?

25 A. Yes. I recognize this as a negotiation that I was having

1 with both Calvin and Robert MacGregor.

2 Q. Over intellectual property?

3 A. No. It was actually over a loan. Calvin was willing to
4 put a loan into the company and potentially come in as an
5 investor. This is part of why I needed the \$12 million to pay
6 out Ira. Calvin doesn't like other people in companies that he
7 can't -- he doesn't know. And the deal was he would give me
8 money into the companies, keep them floating, keep them alive.
9 I had to put up Bitcoin as collateral, number one, which I was
10 going to do. And number two, I had to get rid of Ira. Those
11 were the two conditions.

12 MR. FREEDMAN: Your Honor, Plaintiffs offer P219 into
13 evidence.

14 MS. MCGOVERN: No objection.

15 THE COURT: Admitted into evidence.

16 (Plaintiffs' Exhibit 219 received into evidence.)

17 MR. FREEDMAN: Ms. Vela, can you please put up P223.

18 BY MR. FREEDMAN:

19 Q. Dr. Wright, do you recall the Australian Taxation Office
20 transcripts that we looked at earlier in the case?

21 A. Again, they weren't transcripts. They were things that
22 were erroneous, that I kept saying were erroneous.

23 Q. And do you recognize this as an email between yourself and
24 your wife, Ms. Watts, about those transcripts?

25 A. Yes, where I was talking about one of the many areas they

1 get wrong. I have this habit that my wife hates. Rather than
2 put everything in one email, I document everything line by
3 line, and she really doesn't like it, because I'll do a hundred
4 different points instead of one email structured. I will send
5 her a hundred emails and she usually goes berserk.

6 MR. FREEDMAN: Your Honor, Plaintiffs offer P223 into
7 evidence.

8 MS. MCGOVERN: No objection.

9 THE COURT: Admitted into evidence.

10 (Plaintiffs' Exhibit 223 received into evidence.)

11 MR. FREEDMAN: Can we publish this one to the jury,
12 please.

13 BY MR. FREEDMAN:

14 Q. Dr. Wright, on the bottom we have an email from yourself --
15 from Andrew Miller of the Australian Taxation Office to John
16 Chesher, your CFO. He says: "Could you please review these
17 and advise of any errors or omissions. If you are satisfied
18 that the minutes are an accurate reflection of the discussion,
19 please advise."

20 Dr. Wright, you respond to Ms. Watts in June of 2015 and
21 you say, page 10 of the 11-page document: "The term 'cords' is
22 used. This is 'cores.'"

23 Do you see that?

24 A. Yes. Like I just said, I responded to her multiple times.
25 I went into her office multiple times and said: "This sucks."

1 I went back, and I won't say what I said because then I would
2 have to swear and that would not be good. But I swore a lot
3 about it. I walked back and forwards. Then I threw the
4 document down and said: "It's a piece of you know what." And
5 then I had my lawyer write back directly to the ATO and said:
6 "None of these are accepted."

7 Q. Except the only correction you made is cords to cores,
8 correct?

9 MS. MCGOVERN: Objection. Asked and answered.

10 THE COURT: Overruled.

11 THE WITNESS: No. As I said, I went back and forwards
12 many times. I have this habit -- this is why there's all these
13 little emails -- of being annoying in that I notice something
14 and I send an email. And I mean, I do this to my lawyers too
15 and they pull me up on it. Everyone pulls up on me. Because
16 when I get annoyed, I have this habit of every single little
17 thing, rather than structuring in a nice big structured
18 document -- so what I'm trying to work on these days is I don't
19 send them directly. I'll get my EA Brigy to get a big pile of
20 stuff and collate them.

21 But at this stage, no. Every single one I did, every
22 single page, I would basically run in there and go: This is
23 bleep," expletive, and then I'd run back and go a little bit
24 more and run back out and go: "This is bleep," expletive. And
25 yeah. So no, this isn't the only one.

1 MR. FREEDMAN: Thank you, Ms. Vela.

2 Can you put up P224.

3 BY MR. FREEDMAN:

4 Q. Dr. Wright, do you recognize this as an email from yourself
5 to Ms. Watts and Stefan Matthews and in it you reference
6 software and the Australian Taxation Office? There's also a
7 reference to W&K in it.

8 A. Yes, talking about the software transfer. Yep.

9 MR. FREEDMAN: Your Honor, Plaintiffs offer P224 into
10 evidence.

11 MS. MCGOVERN: No objection.

12 THE COURT: Admitted into evidence.

13 (Plaintiffs' Exhibit 224 received into evidence.)

14 MR. FREEDMAN: Ms. Vela, can you please put up P274.

15 BY MR. FREEDMAN:

16 Q. Dr. Wright, do you recognize this as an email from yourself
17 to Alan Pederson attaching the W&K Whitepaper?

18 MR. FREEDMAN: Ms. Vela, can you show --

19 MS. MCGOVERN: Objection. Objection, Your Honor.
20 Misstates the document.

21 THE COURT: Sustained. Rephrase.

22 MR. FREEDMAN: Ms. Vela, can you please show Dr.
23 Wright the first page of the attachment.

24 BY MR. FREEDMAN:

25 Q. And, Dr. Wright, do you see where it says: "Company name"

1 and lists W&K?

2 A. Yes, I do.

3 Q. In the top left it says: "Whitepaper"?

4 A. Yes.

5 MR. FREEDMAN: Your Honor, Plaintiffs offer P274 into
6 evidence.

7 MS. MCGOVERN: No objection.

8 THE COURT: Admitted into evidence.

9 (Plaintiffs' Exhibit 274 received into evidence.)

10 MR. FREEDMAN: Ms. Vela, can you please put up P313.

11 BY MR. FREEDMAN:

12 Q. Dr. Wright, do you recognize this as an email from yourself
13 talking about the hard drive and them being wiped?

14 A. This was to do with some hard drives being wiped, but it's
15 not all the hard drives being wiped.

16 MR. FREEDMAN: Your Honor, Plaintiffs offer P313 into
17 evidence.

18 MS. MCGOVERN: No objection.

19 THE COURT: Admitted into evidence.

20 (Plaintiffs' Exhibit 313 received into evidence.)

21 MR. FREEDMAN: Could we please publish this to the
22 jury.

23 BY MR. FREEDMAN:

24 Q. Dr. Wright, do you see your email -- it says: "Things that
25 help prove my involvement in Bitcoin to at least 2009."

1 Do you see that?

2 A. I do.

3 Q. Can you please read for the jury the email that your email
4 came from.

5 A. Craig@ncrypt.com.

6 Q. Thank you.

7 MR. FREEDMAN: Ms. Vela, can you please put up P326.

8 BY MR. FREEDMAN:

9 Q. Dr. Wright, do you recognize this as an email from yourself
10 surrounding the circumstances of the 2016 PR event?

11 A. Again, no, I don't, and no, it doesn't help the other one.
12 You're saying nCrypt Craig, but that doesn't mean me. I'm
13 sorry. On one machine and a different machine, they can have
14 the same thing there differently.

15 That's a forwarded email and, no, the other one's not.
16 And -- let's see.

17 Q. Dr. Wright, do you see numerous references to Satoshi
18 Nakamoto?

19 A. I see some, yes.

20 MR. FREEDMAN: Your Honor, Plaintiffs offer P326 into
21 evidence.

22 MS. MCGOVERN: Objection, Your Honor. Foundation,
23 hearsay, relevance.

24 THE COURT: I'm sorry. The basis?

25 MS. MCGOVERN: Foundation, hearsay, relevance, Your

1 Honor.

2 THE COURT: Overruled.

3 326 admitted into evidence.

4 (Plaintiffs' Exhibit 326 received into evidence.)

5 MR. FREEDMAN: Ms. Vela, can you please bring up P578.

6 BY MR. FREEDMAN:

7 Q. Dr. Wright, do you recognize this as an email from yourself
8 to Ira Kleiman?

9 A. It looks like it, yes.

10 Q. And you were purportedly forwarding email communications
11 from his deceased brother, Dave Kleiman?

12 A. I was forwarding emails that I had while he was alive.

13 MR. FREEDMAN: Your Honor, Plaintiffs offer P578 into
14 evidence.

15 MS. MCGOVERN: No objection, Your Honor.

16 THE COURT: Admitted into evidence.

17 (Plaintiffs' Exhibit 578 received into evidence.)

18 MR. FREEDMAN: Ms. Vela, can you please put up P598.

19 BY MR. FREEDMAN:

20 Q. And, Dr. Wright, the top email there, do you recognize this
21 as an email from yourself to Mark Italia of the ATO?

22 A. That looks familiar, I believe. I can't remember all the
23 names, but Michael Hardy was definitely one of the ones I
24 emailed.

25 MR. FREEDMAN: Your Honor, Plaintiffs offer P598 into

1 evidence.

2 MS. MCGOVERN: Objection, Your Honor. Relevance.

3 THE COURT: Overruled. Admitted into evidence.

4 (Plaintiffs' Exhibit 598 received into evidence.)

5 MR. FREEDMAN: Can we please publish this to the jury.

6 BY MR. FREEDMAN:

7 Q. Dr. Wright, in this email to the Australian Taxation Office
8 you tell them that you're funding -- your group controls 5
9 percent of the global Bitcoin market?

10 A. Yes. I said that.

11 Q. Thank you.

12 MR. FREEDMAN: Ms. Vela, can you please bring up P664.

13 BY MR. FREEDMAN:

14 Q. Dr. Wright, do you recognize this as an email from yourself
15 to your CFO and your lawyer attaching Dave Kleiman's public
16 keys?

17 A. I can't see Dave's public keys on there, but it looks like
18 an email I sent.

19 MR. FREEDMAN: Your Honor, Plaintiffs offer P664 into
20 evidence.

21 MS. MCGOVERN: No objection, Your Honor.

22 THE COURT: Admitted into evidence.

23 (Plaintiffs' Exhibit 664 received into evidence.)

24 MR. FREEDMAN: Ms. Vela, can you please bring up P695.

25

1 BY MR. FREEDMAN:

2 Q. Dr. Wright, do you recognize this as an email from yourself
3 to Ms. Watts and Stefan Matthews talking about Patrick Paige
4 and Dave Kleiman?

5 A. The exchange header means it would have been one of the
6 ones I had my EA send, but I would have been the one who asked
7 her to send it, as in dictated it.

8 MR. FREEDMAN: Your Honor, Plaintiffs offer P695 into
9 evidence.

10 MS. MCGOVERN: No objection.

11 THE COURT: Admitted into evidence.

12 (Plaintiffs' Exhibit 695 received into evidence.)

13 MR. FREEDMAN: Can we please publish -- no. Never
14 mind.

15 Ms. Vela, can we show P707 to the witness and counsel.

16 BY MR. FREEDMAN:

17 Q. Dr. Wright, do you recognize this as an email from yourself
18 to Ms. Watts attaching ATO responses?

19 A. I can't see the responses. Sorry.

20 Q. And do you see where it says: "Kleiman cost model"?

21 A. I can see that term, but I can't see any of the
22 attachments.

23 MR. FREEDMAN: Your Honor, Plaintiffs offer P707 into
24 evidence.

25 MS. MCGOVERN: Objection, Your Honor. Relevance,

1 hearsay.

2 THE COURT: Is it just the one page?

3 MR. FREEDMAN: It is not, Your Honor.

4 BY MR. FREEDMAN:

5 Q. You have seen this document before, right, Dr. Wright?

6 A. (No verbal response.)

7 MR. FREEDMAN: Your Honor, because the top email is an
8 email from Dr. Wright --

9 MS. MCGOVERN: I'm sorry. I can't hear you.

10 THE COURT: You're seeking to admit the exhibit, but
11 the exhibit has an attachment. So let's lay the foundation,
12 please.

13 MR. FREEDMAN: The attachment was attached to -- Ms.
14 Vela, can you please go to the first page, please.

15 BY MR. FREEDMAN:

16 Q. Dr. Wright, this is your email to Ms. Watts and you
17 attached all these documents?

18 A. I don't know. I can't actually see the email address.

19 MR. FREEDMAN: Ms. Vela, let's go through the
20 attachments.

21 You know what? We'll try once.

22 Your Honor, Plaintiffs offer as an adoptive admission
23 P707.

24 MS. MCGOVERN: Objection, Your Honor. Foundation,
25 hearsay.

1 THE COURT: Is it with regard to the email and the
2 attachment? Are you seeking to introduce the entire document?

3 MR. FREEDMAN: Yes, Your Honor.

4 (Pause in proceedings.)

5 THE COURT: Go back, please.

6 MR. FREEDMAN: Can you go back to the first page, Ms.
7 Vela.

8 (Pause in proceedings.)

9 THE COURT: And the objection is on grounds of
10 relevance?

11 MS. MCGOVERN: Foundation, relevance, hearsay, Your
12 Honor.

13 THE COURT: Dr. Wright, do you recognize the first
14 exhibit as an email that you sent?

15 THE WITNESS: I don't, but there was a corporate CEO
16 account. So unless I see the document, I can't say whether it
17 would have been that.

18 THE COURT: Is there any other reference to the actual
19 email address in this document?

20 MR. FREEDMAN: Can you bring up the native?

21 Give us one minute, Your Honor. We can bring up the
22 native.

23 THE COURT: Certainly.

24 (Pause in proceedings.)

25 MR. FREEDMAN: We're waiting for the Internet to pull

1 that up. In the meantime, we'll continue making progress, Your
2 Honor, if that's okay.

3 THE COURT: All right.

4 MR. FREEDMAN: We'll come back to P707.

5 Ms. Vela, can you please bring up P055.

6 BY MR. FREEDMAN:

7 Q. Dr. Wright, do you recognize this as a purported email
8 between yourself and Dave Kleiman?

9 A. It's his email address and some of the words look familiar.

10 MR. FREEDMAN: Your Honor, Plaintiffs offer P055 into
11 evidence.

12 MS. MCGOVERN: No objection.

13 THE COURT: Admitted into evidence.

14 (Plaintiffs' Exhibit 055 received into evidence.)

15 BY MR. FREEDMAN:

16 Q. Dr. Wright, is this a legitimate email from Dave Kleiman?

17 A. No idea.

18 Q. Did you forge this email from Dave Kleiman?

19 A. Did not.

20 MR. FREEDMAN: Ms. Vela, can you please bring up P135.

21 BY MR. FREEDMAN:

22 Q. Dr. Wright, do you recognize this as a purported email
23 between Dave Kleiman and yourself?

24 A. I know we had an email "Bond Villains," but I don't
25 remember the text in this one. It doesn't look right.

1 MR. FREEDMAN: Your Honor, Plaintiffs offer --

2 BY MR. FREEDMAN:

3 Q. Did you see the Bates label on the bottom, Dr. Wright,
4 saying that it was produced by your side?

5 A. Yes, but as I've stated, produced by my side is over 30
6 staff computers, several servers, material received from third
7 parties, none of which I've reviewed. So ...

8 Q. So the emails between yourself and Dave Kleiman that you
9 were most concerned when you found out had been leaked was
10 something 30 staff members had access to?

11 MS. MCGOVERN: Objection, Your Honor. I'm also having
12 a difficult time hearing him. Sorry.

13 THE COURT: Overruled.

14 THE WITNESS: Potentially, yes. We had an IT team and
15 the IT team ran the exchange servers. So I had a CTO -- a CIO,
16 which is a chief technology officer -- chief information
17 officer. There were -- I had an exchange server, a Windows
18 domain administrator, and a database administrator, all of
19 which had administrative privileges.

20 The exchange administrator had two people who worked
21 for him, all of whom had full email access. Like most
22 corporations, on top of that, we had general network IT people.
23 I'm really embarrassed, but I don't even remember their names.
24 So yes.

25 MR. FREEDMAN: Your Honor, Plaintiffs offer P135 into

1 evidence.

2 MS. MCGOVERN: Objection, Your Honor. Foundation.
3 Hearsay.

4 THE COURT: The objection is overruled.

5 Admitted into evidence.

6 (Plaintiffs' Exhibit 135 received into evidence.)

7 BY MR. FREEDMAN:

8 Q. Dr. Wright, is this a legitimate email from Dave Kleiman?

9 A. Actually don't recognize it.

10 Q. Did you forge this email from Dave Kleiman?

11 A. The thing is I don't recognize it. Then no.

12 MR. FREEDMAN: Ms. Vela, can you please put up P514.

13 BY MR. FREEDMAN:

14 Q. Dr. Wright, do you recognize this as a purported email from
15 Dave Kleiman to yourself?

16 A. Yep, that looks about right.

17 MR. FREEDMAN: Your Honor, Plaintiffs offer P514 into
18 evidence.

19 MS. MCGOVERN: No objection, Your Honor.

20 THE COURT: Admitted into evidence.

21 (Plaintiffs' Exhibit 514 received into evidence.)

22 BY MR. FREEDMAN:

23 Q. Dr. Wright, is this a legitimate email from Dave Kleiman?

24 A. I couldn't actually say. I don't know where you -- which
25 machine you got it from, so I don't know.

1 Q. Did you forge this email from Dave Kleiman?

2 A. No. The trust documentation actually goes back to the
3 court case in Australia. So no, Dave was actually alive during
4 the start of all this.

5 MR. FREEDMAN: Ms. Vela, can you please put up P538.

6 BY MR. FREEDMAN:

7 Q. Dr. Wright, do you recognize this as a purported email
8 between yourself and Dave Kleiman?

9 A. Looks familiar. I can't say more than that.

10 MR. FREEDMAN: Your Honor, Plaintiffs offer P538 into
11 evidence.

12 MS. MCGOVERN: No objection.

13 THE COURT: Admitted into evidence.

14 (Plaintiffs' Exhibit 538 received into evidence.)

15 BY MR. FREEDMAN:

16 Q. Dr. Wright, did you forge this email from Dave Kleiman?

17 A. I have not forged any emails.

18 Q. Is that a no?

19 A. I have not forged any emails.

20 Q. Did you forge this document the jury's looking at on their
21 screen now that purported --

22 MS. MCGOVERN: Objection, Your Honor. Asked and
23 answered.

24 THE COURT: Overruled.

25 Did you hear the question, sir?

1 THE WITNESS: I did.

2 THE COURT: All right.

3 THE WITNESS: I have not forged any emails, including
4 this one.

5 MR. FREEDMAN: Ms. Vela, can you please bring up P540.

6 BY MR. FREEDMAN:

7 Q. Is this a purported email between yourself and Dave
8 Kleiman, Dr. Wright?

9 A. There's some problems with this email. So I had
10 communications with Dave around that time, but there's
11 something funky in the middle of that text.

12 MR. FREEDMAN: Your Honor, Plaintiffs offer P540 into
13 evidence.

14 MS. MCGOVERN: Objection, Your Honor. Foundation,
15 hearsay.

16 THE COURT: Overruled. Admitted into evidence.

17 (Plaintiffs' Exhibit 540 received into evidence.)

18 BY MR. FREEDMAN:

19 Q. Dr. Wright, did you forge this email to Dave Kleiman?

20 A. As I've already stated, I have not forged any emails.

21 MR. FREEDMAN: Ms. Vela, can you please --

22 BY MR. FREEDMAN:

23 Q. Dr. Wright, I asked this email. Did you forge this email
24 to Dave Kleiman?

25 A. The definition of any would include any, all, everything.

1 Q. So --

2 A. Any existing email in existence ever.

3 Q. Maybe we're having a miscommunication. Did you forge this
4 email? Yes or no.

5 MS. MCGOVERN: Objection. Asked and answered.

6 THE COURT: "Did you forge," is that the question?

7 MR. FREEDMAN: This email, yes or no.

8 THE WITNESS: As I stated, I have never forged an
9 email, any email.

10 THE COURT: Does it include this email, sir? Could
11 you answer the question, please.

12 THE WITNESS: Including this email. I have never
13 forged an email.

14 MR. FREEDMAN: Thank you, Your Honor.

15 Ms. Vela, please put up P630.

16 BY MR. FREEDMAN:

17 Q. Dr. Wright, do you recognize this as an email from yourself
18 to Ira Kleiman?

19 A. Yes. It looks like something I forwarded.

20 Q. Purporting to be forwarding an email that's PGP key signed
21 by Dave Kleiman?

22 A. Can't say whether it's purporting to be anything. You have
23 to check PGP by other means.

24 MR. FREEDMAN: Your Honor, Plaintiffs offer P630 into
25 evidence.

1 MS. MCGOVERN: No objection, Your Honor.

2 THE COURT: Admitted into evidence.

3 (Plaintiffs' Exhibit 630 received into evidence.)

4 BY MR. FREEDMAN:

5 Q. Dr. Wright, did you forge this email?

6 A. I have not forged any email, including this one, ever.

7 MR. FREEDMAN: Ms. Vela, could you please put up P797.

8 BY MR. FREEDMAN:

9 Q. Do you recognize this, Dr. Wright, as a purported email
10 between Dave Kleiman and Uyen Nguyen?

11 A. I don't. I'm not involved.

12 Q. Dr. Wright, your lawyers attached this document to a motion
13 in front of the Court --

14 MS. MCGOVERN: Objection, Your Honor. Foundation,
15 predicate.

16 THE COURT: Sustained.

17 MR. FREEDMAN: Ms. Vela, please take that down for
18 now.

19 Can we put up P799, please.

20 BY MR. FREEDMAN:

21 Q. Dr. Wright, do you recognize this as a purported email
22 between yourself and Dave Kleiman?

23 A. Not at all. There's no recipient or other details. So it
24 doesn't look like.

25 Q. Do you see it says: "To Craig Wright," it's signed:

1 "Dave" at the bottom?

2 A. Hmm. It's missing information, though.

3 Q. Is that because it's a draft, Dr. Wright?

4 A. Even a draft would have time stamps. So I'm not sure
5 what's wrong with that one.

6 (Pause in proceedings.)

7 BY MR. FREEDMAN:

8 Q. Do you see on the second page, Dr. Wright, there appears to
9 be a PGP key from Dave Kleiman signing the message?

10 A. That's not correct.

11 Q. Do you see: "Begin PGP signature, end PGP signature"?

12 A. That is potentially a PGP signature field. It's not a key.

13 Q. Okay. Do you recognize it as being a PGP signature
14 purporting to be from Dave Kleiman?

15 A. No. The only way to validate that would be running it
16 through a computer program. You can't do that by looking at
17 it.

18 MR. FREEDMAN: Your Honor, Plaintiffs offer P799 into
19 evidence.

20 MS. MCGOVERN: Objection, Your Honor. Foundation,
21 hearsay, authenticity.

22 THE COURT: With regard to the foundation, sustained.

23 MR. FREEDMAN: Your Honor, may we approach for a
24 minute?

25 THE COURT: You can attempt to lay the foundation,

1 Mr. Freedman. There's no reason to approach.

2 BY MR. FREEDMAN:

3 Q. Dr. Wright, do you recognize the craig@rcjbr email address
4 that's on the top of the email chain?

5 A. As I stated, I recognize that it's saying to my address,
6 but I don't recognize this as an email to me. This is --
7 there's something -- it's incomplete.

8 Q. It is incomplete. Subject is incomplete, correct?

9 A. I don't know about the subject. The subject says: "D."
10 You can't say whether that's incomplete or not. A single
11 letter could be a subject. Nothing could be a subject.

12 Q. And despite it being incomplete, it purports to have a
13 signed message from Dave Kleiman with PGP, correct?

14 MS. MCGOVERN: Objection, Your Honor. Asked and
15 answered. Argumentative.

16 THE COURT: Sustained.

17 BY MR. FREEDMAN:

18 Q. And on the bottom you see a Bates label. That means it was
19 produced from the machines that you collected it from, correct?

20 A. No. As I said, my lawyers were handed over everything from
21 the companies. That included material from people in Australia
22 that worked for the companies. It included material held
23 overseas. It included something like 60 boxes that had been
24 sealed, and that I've never seen the contents of.

25 MR. FREEDMAN: Plaintiffs offer P799 into evidence.

1 MS. MCGOVERN: Objection. Your Honor, there's no
2 foundation, authenticity, or indicia of reliability of this
3 document, and he stated that several times.

4 THE COURT: Mr. Freedman, is that Dr. Wright's email
5 address? Is there anything to show that that in fact was an
6 email that was sent from his email address?

7 MR. FREEDMAN: Your Honor, it's a draft of an email
8 that eventually gets sent, and it's the beginning --

9 THE COURT: All right. Do you want to focus on the
10 one that was actually sent?

11 MR. FREEDMAN: We need the draft, Your Honor, to show
12 the progress of what eventually became the final email that got
13 sent.

14 THE COURT: And is the final the same email address?

15 MR. FREEDMAN: Very similar.

16 Ms. Vela, could you please bring up P --

17 MS. MCGOVERN: Your Honor, if I could just make a
18 statement, though. There's no "To/From." There's nothing in
19 the header that even suggests where this came from. So with
20 respect to the email address, I'd simply like to note for the
21 record, there's no "From" even in the title.

22 THE COURT: Agreed. Sustained.

23 MR. FREEDMAN: Ms. Vela, can you please bring up P630
24 next to it.

25 Your Honor, what indicates where it came from is the

1 Bates label on the bottom.

2 BY MR. FREEDMAN:

3 Q. The one on the top, Dr. Wright, P630, is in evidence and it
4 is an email from yourself to Ira Kleiman. The subject is:
5 "Designed by." The one on the left is the draft of that email.
6 Isn't that true, Dr. Wright?

7 A. No, because that wouldn't have: "Designed by" and they're
8 different email systems. Completely different. The RCJBR is a
9 Google Gmail account. The other one is a hosted exchange
10 server account. The names are different. If you look at it,
11 "Craig Wright," "Craig S. Wright." So the "Craig S. Wright" is
12 sent by Gmail.

13 Q. Dr. Wright, you're comparing the wrong two. Look at the
14 craig@rcjbr on the right-hand side and the craig@rcjbr on the
15 left-hand side.

16 A. The name is set by Google. So that means it has nothing to
17 do with my email. If it's Craig Wright rather than Craig S.
18 Wright, it is not from my email account. Sorry. Not mine.

19 MR. FREEDMAN: Your Honor, may we please approach on
20 this issue? It's important.

21 THE COURT: All right. Come on forward.

22 (At sidebar on the record.)

23 MR. FREEDMAN: Your Honor, the email that is on the
24 left-hand side is a draft email that was produced by the
25 Defense. It is the draft to the forgery that ends up being

1 sent in P630. It was on the right-hand side.

2 I have no way to verify that it is in fact an email
3 that was sent because it wasn't sent; it was saved as a draft.
4 E-Discovery picked it up and produced it over to us. It shows
5 the progression of this and is identical almost to the document
6 that eventually gets sent out. So he's verified that email
7 address. It has his Bates label on the bottom, and the
8 identical one eventually gets sent.

9 MS. MCGOVERN: Your Honor, at some point the
10 foundation from a witness being laid for the document has to
11 matter. So there's 233,000 documents, over a million pages.
12 From about 10 different servers, including a supercomputer from
13 all over the place, from Australia, from England. We have been
14 asked to argue before Your Honor whether the mere production of
15 the documents by us is somehow -- sort of provides the gateway
16 to admission in trial in front of a jury.

17 THE COURT: Well, that I agree with. The mere fact
18 that it was produced by the Defendant -- you need to lay the
19 proper foundation.

20 My question is -- if the witness does not agree that
21 that is an email that was sent but the email address is the
22 same email address that is with regard to other emails that
23 were sent, then it would appear to go to the weight as opposed
24 to its admissibility. So the question for me is: Was that
25 email Dr. Wright's email?

1 MR. FREEDMAN: He's previously testified that RCJBR
2 email address is his in court today.

3 MS. MCGOVERN: But, Your Honor, the problem that we're
4 having is that the document that they're seeking to admit --
5 just to be clear, because they're freely explaining what the
6 theories are. They've got an expert that's coming in who's
7 going to say he forged the documents. They need this. I get
8 it. But the reality is they've got to be able to lay the
9 foundation so that there's not an unfair prejudice to the
10 Defendant in front of the jury on these things. He has
11 testified: "I don't recognize the email." You just have to
12 look at it. It does --

13 THE COURT: All right. It certainly doesn't look like
14 a standard email.

15 MR. FREEDMAN: This is a draft.

16 THE COURT: If it was a forged email but it reflects
17 his address, then the fact that the witness has already
18 identified it as his email address, it would seem as if it
19 would go to the weight as opposed to its admissibility when he
20 says: "It's not in a proper format; I don't recognize it in
21 this form."

22 MS. MCGOVERN: But the proper format, Your Honor, is
23 it doesn't -- even though that it came from that email
24 address --

25 THE COURT: Well, that's --

1 MS. MCGOVERN: It says: "To."

2 THE COURT: Right. That's the problem.

3 MS. MCGOVERN: Who sent it?

4 MR. FREEDMAN: Because it's supposed to be an email
5 from Dr. Wright. The next email on the right-hand side of the
6 screen shows --

7 MS. MCGOVERN: Your Honor --

8 MR. FREEDMAN: Ms. McGovern, let me finish.

9 The email on the right-hand side shows the final
10 product of the forgery. It is the same exact text, and it was
11 supposed to be -- Dr. Wright passed it off as an email from
12 Dave Kleiman to Craig Wright, and he was creating that forgery
13 with that draft document.

14 MS. MCGOVERN: The problem with all of this is that
15 you haven't laid the foundation for the document, and the email
16 has no indicia of --

17 THE COURT: I agree with regard to the draft.

18 630 is in evidence.

19 (End of discussion at sidebar.)

20 MR. FREEDMAN: Ms. Vela, can you please put up P630 on
21 the right-hand side.

22 BY MR. FREEDMAN:

23 Q. Dr. Wright, do you see P630, which is in evidence, is an
24 email from yourself to yourself? Do you see that?

25 A. I see that there's an email forwarded.

1 Q. No. No. I'm looking at the one underneath from Craig S.
2 Wright to Craig Wright.

3 Do you see that?

4 A. Yes, but I can't see the address. Without the address, I
5 can't tell you. Doesn't say craigwright@, anything like that.
6 So I can't answer that. The "To" field can say anything.

7 THE COURT: You may show the jury. 630 is in
8 evidence.

9 MR. FREEDMAN: Your Honor, I'm taking one more shot at
10 P799.

11 MS. MCGOVERN: Your Honor, we've objected to 799 and
12 it's been sustained, Your Honor.

13 THE COURT: All right. Let's continue.

14 BY MR. FREEDMAN:

15 Q. Dr. Wright, did you draft the email on the right-hand side
16 that is from Craig Wright to Craig Wright?

17 A. No. That's a forwarded email. So it's a forward of the
18 other. So I didn't draft the email. No.

19 MR. FREEDMAN: Ms. Vela, put the one on the left-hand
20 side down, please, P799.

21 This is in evidence. Can we publish this to the jury,
22 please.

23 BY MR. FREEDMAN:

24 Q. Dr. Wright, I'm looking at the highlighting in the middle
25 of the page. It says: "From Craig S. Wright" --

1 A. Uh-huh.

2 Q. -- "sent Monday, 10th of December 2012, to Craig Wright."

3 Do you see that?

4 A. I see that.

5 Q. So it's an email sent from Craig Wright to Craig Wright,
6 correct?

7 A. I can't actually say correct because I don't know what the
8 "Craig Wright" is. The "Craig Wright" is a "To" field. It
9 could be the corporate CEO account. It could be my email. I
10 don't know without the email. Cannot say. Cannot answer.
11 Don't know without that information.

12 Q. But, Dr. Wright, RCJBR is your email address, and that's
13 the "From" address, which means that's the email that sent the
14 email, correct?

15 A. The email saying: "Craig S. Wright" is mine. The "To," I
16 don't know whether that's Craig Wright or something else. It
17 could be anything. I don't know.

18 Q. Fine.

19 MR. FREEDMAN: Ms. Vela, take down the callout.

20 BY MR. FREEDMAN:

21 Q. So you sent the email below. We don't know to who, but you
22 sent the email below, correct? You just said that. That's
23 your email address. You sent it. You just don't know to who,
24 correct?

25 A. I don't know what the to address is. I don't have the

1 original. I know how it's displaying.

2 Q. You sent the email below, correct?

3 A. I sent the one that you have got highlighted at that point.

4 To who I don't know.

5 MR. FREEDMAN: Your Honor, Plaintiffs' offer P799 into
6 evidence now.

7 MS. MCGOVERN: Objection. We've just gone over this,
8 Your Honor. We restate our objection, Your Honor. We're
9 simply redoing it. This is another consideration of the same
10 argument we just made sidebar, Your Honor. We object.

11 THE COURT: Is it the same email address, sir?

12 MR. FREEDMAN: It is, Your Honor. It's the exact same
13 email address, and the witness has just testified that he sent
14 the email. Now we're seeking to introduce the draft.

15 THE WITNESS: That's not correct.

16 THE COURT: Put the other one up for me.

17 MR. FREEDMAN: Ms. Vela, can you please put up P799 on
18 the left-hand side for just the Court and counsel.

19 Can you highlight the email on the left-hand side that
20 Dr. Wright just testified is his own.

21 The "from" on the right and the "To" on the left, Your
22 Honor, they match.

23 THE WITNESS: They do not.

24 MS. MCGOVERN: Your Honor, our objection is with
25 respect to authenticity and foundation, the same as made

1 sidebar, Your Honor.

2 THE WITNESS: That is a different email address on a
3 different server. If it was my server, it would come up as
4 "Craig S. Wright." It doesn't. It is a separate person
5 sending it.

6 THE COURT: The witness has testified that he sent
7 P630 to the email address craig@rcjbr.org. The exhibit, which
8 is Plaintiffs' proposed 799, reflects that address. That goes
9 to the weight as opposed to its admissibility. That is what
10 the Court had a concern about and I believe that the foundation
11 has been sufficiently laid.

12 The objection is noted. It's overruled.

13 799 will be admitted into evidence.

14 (Plaintiffs' Exhibit 799 received into evidence.)

15 THE COURT: My apologies. The court reporter's screen
16 just went down. Let's stop the proceeding for a moment.

17 MR. FREEDMAN: Your Honor, this is actually a great
18 time to take a break for us, if we want to take our 20-minute
19 break.

20 THE COURT: Yes. Let's go ahead and take a 20-minute
21 recess and we'll attempt to work on this equipment.

22 (Jury not present, 3:08 p.m.)

23 (Recess from 3:08 p.m. to 3:30 p.m.)

24 THE COURT: All right. Welcome back.

25 Are we ready to proceed, Yvette?

1 All right. Anything we need to address before we
2 bring the jury back?

3 MR. FREEDMAN: Just need to grab the mic.

4 THE COURT: Ms. McGovern?

5 MS. MCGOVERN: No, Your Honor.

6 THE COURT: All right. Let's bring the jury back in,
7 pleas.

8 (Before the Jury, 3:30 p.m.)

9 THE COURT: All right. Welcome back, Ladies and
10 Gentlemen of the Jury. Please be seated.

11 And we'll continue with the questioning.

12 MR. FREEDMAN: Your Honor, actually, one housekeeping
13 question. P546, I have it as in evidence.

14 THE COURT: 546?

15 MR. FREEDMAN: Yes.

16 THE COURT: It is not in evidence.

17 MR. FREEDMAN: Not in evidence.

18 Ms. Vela, can you please put up P546 for just counsel
19 and the witness.

20 THE COURT: Can we put 546 up on the screen?

21 MR. FREEDMAN: Is there an issue with the exhibit or
22 the system?

23 BY MR. FREEDMAN:

24 Q. Dr. Wright, do you recognize this as a purported email
25 between Dave Kleiman and yourself?

1 A. It looks familiar. I don't remember the discussion. We
2 had an email chat about my divorce.

3 MR. FREEDMAN: Your Honor, Plaintiffs offer P546 into
4 evidence.

5 MS. MCGOVERN: No objection.

6 THE COURT: Admitted into evidence.

7 (Plaintiffs' Exhibit 546 received into evidence.)

8 MR. FREEDMAN: Ms. Vela, can you put P720 on the
9 screen for counsel and the witness.

10 BY MR. FREEDMAN:

11 Q. Dr. Wright, do you recognize this as an email between
12 yourself and Ira Kleiman?

13 A. Yes. It looks like one of the emails forwarded to Ira
14 Kleiman.

15 MR. FREEDMAN: Your Honor, Plaintiffs offer P720 into
16 evidence.

17 MS. MCGOVERN: No objection.

18 THE COURT: Admitted into evidence.

19 (Plaintiffs' Exhibit 720 received into evidence.)

20 MR. FREEDMAN: Ms. Vela, can you please bring up P807
21 for the witness and counsel.

22 BY MR. FREEDMAN:

23 Q. Dr. Wright, this email that purports to be between Dave
24 Kleiman and Uyen Nguyen, did you authorize this letter to be
25 filed on your behalf in this litigation?

1 A. No. What happens is all of the computers, which would have
2 included some of Uyen's computers, were given over, as I
3 stated. So there's no authorize anything to be filed. What
4 happened was the company computers were all imaged: the staff,
5 ex-staff, directors, ex-directors, people who were contractors.
6 Anyone. All of that material, all of the boxes, the paperwork,
7 anything I could get hold of, I was told to hand over. Didn't
8 look at it. Handed it over. The lawyers do what the lawyers
9 do.

10 Q. So I just want to clarify. My question is not whether you
11 authorized it to be handed over. It's did you authorize it to
12 be used as a filing in front of the Court?

13 MS. MCGOVERN: Objection, Your Honor. Privilege.

14 THE COURT: Sustained.

15 MR. FREEDMAN: I didn't hear the basis of the
16 objection.

17 MS. MCGOVERN: Privilege.

18 THE COURT: Privilege.

19 MR. FREEDMAN: Ms. Vela, can you please bring up P809.

20 Actually, let's go to P824.

21 BY MR. FREEDMAN:

22 Q. Dr. Wright, do you see this as an email from yourself,
23 craig@rcjbr, to yourself, craig@rcjbr?

24 A. Yes. Although the reply one, there's something different.
25 So the machine -- there's something different on the machine

1 because Google would always put it as "Craig S. Wright."

2 Q. Subject is: "D"?

3 A. I see that.

4 Q. And it's signed at the bottom: "Dave"?

5 A. His name's at the bottom.

6 MR. FREEDMAN: Your Honor, Plaintiffs offer P824 into
7 evidence.

8 MS. MCGOVERN: No objection.

9 THE COURT: Admitted into evidence.

10 (Plaintiffs' Exhibit 824 received into evidence.)

11 MR. FREEDMAN: And, Ms. Vela, can you please bring up
12 P856.

13 BY MR. FREEDMAN:

14 Q. Dr. Wright, do you recognize this as another email from
15 yourself to yourself?

16 A. No, I don't, because there's no other thing. You can put
17 any name in a "From" and "To" field in Outlook. So no, I
18 don't.

19 MR. FREEDMAN: Ms. Vela, can you put up P824 side by
20 side.

21 BY MR. FREEDMAN:

22 Q. Dr. Wright, this is also from Craig -- this is in evidence.
23 This is also from Craig S. Wright to Craig Wright, just like on
24 the left-hand side. It also contains on the right-hand side --
25 it also contained an alleged PGP message from Dave Kleiman.

1 Does that help? You remember that in fact you did send
2 this message from yourself to yourself?

3 A. They're both different, actually. What you'll look at is
4 the "From" and "To," they're both different. Sorry. They're
5 not the same.

6 MR. FREEDMAN: Your Honor, Plaintiffs offer P856 into
7 evidence.

8 MS. MCGOVERN: Objection, Your Honor. Foundation.

9 THE COURT: Can I see the email address on 856,
10 please?

11 MR. FREEDMAN: Your Honor, let me check if that
12 exists. Could be that it was produced to us as a PDF and not
13 as an actual email file. I'm going to check.

14 Your Honor, if we could have a moment, we're going to
15 access the form in which it was produced.

16 THE COURT: All right.

17 MR. FREEDMAN: In the interim, we'll get back to P856.

18 Ms. Vela, can you please put up P187.

19 BY MR. FREEDMAN:

20 Q. Dr. Wright, do you recognize this as an email from yourself
21 to Andrew Sommer and Ramona Watts?

22 A. I don't recognize it, but it looks like one. I can't see
23 the address.

24 MR. FREEDMAN: Your Honor, Plaintiffs offer P187 into
25 evidence.

1 MS. MCGOVERN: No objection.

2 THE COURT: Admitted into evidence.

3 (Plaintiffs' Exhibit 187 received into evidence.)

4 MR. FREEDMAN: Ms. Vela, can you please bring up P853
5 for the witness and counsel. P853.

6 (Pause in proceedings.)

7 MR. FREEDMAN: Are we having an issue with P853?

8 Your Honor, our computer appears to have frozen. Can
9 you give us one minute.

10 THE COURT: Certainly.

11 (Pause in proceedings.)

12 MR. FREEDMAN: Okay.

13 BY MR. FREEDMAN:

14 Q. Dr. Wright, this is your Slack channel, and do you see
15 here -- we've actually looked at this earlier in the case -- do
16 you see Mr. Kleiman is mentioned?

17 MS. MCGOVERN: Mr. Freedman, what exhibit number is
18 this, please?

19 MR. FREEDMAN: P853. But there's a lot of them in
20 P853.

21 MS. MCGOVERN: Because I have a different P853.

22 MR. FREEDMAN: There's a lot of messages in P853.
23 We're only using this one.

24 MS. MCGOVERN: It is not even related. The one I have
25 is not this one.

1 THE COURT: Yes. The Court only allowed the first
2 page, one page of 853.

3 MR. FREEDMAN: Right. So we're looking to establish
4 another page.

5 THE COURT: All right.

6 BY MR. FREEDMAN:

7 Q. Dr. Wright, do you recognize this as your Slack account?

8 A. I do.

9 MR. FREEDMAN: Your Honor, we offer -- we'll call this
10 P853.2.

11 THE COURT: Is it just this one page?

12 MR. FREEDMAN: Ms. Vela, can you zoom out to show the
13 Court the entirety of the message.

14 That's the entirety of it, Your Honor.

15 THE COURT: Is there any objection?

16 MS. MCGOVERN: No objection, Your Honor.

17 THE COURT: All right. Admitted into evidence.

18 (Plaintiffs' Exhibit 853.2 received into evidence.)

19 MR. FREEDMAN: Ms. Vela, do we have the native of P856
20 up?

21 MS. MCGOVERN: Your Honor, if we could just make sure
22 we have the same document for P835. I hate to take up the
23 Court's time or the time on this, but our P853 is not this
24 document. It might be our mistake.

25 MR. FREEDMAN: P853 -- well, as I understand it, P853

1 is a compilation of numerous documents, one of which is this.

2 Is this not included in any of the P853 that you have?

3 MS. MCGOVERN: Can you just give me the Bates number
4 for this?

5 MR. FREEDMAN: I don't know if there's a Bates number.

6 MS. MCGOVERN: There is no Bates number?

7 MR. FREEDMAN: There may not be.

8 THE COURT: All right. So there are now two pages of
9 Plaintiffs' Exhibit 853, correct?

10 MR. FREEDMAN: Correct.

11 THE COURT: All right.

12 MR. FREEDMAN: Ms. Vela, the Court asked to see the
13 native of P856. Can we show that?

14 MS. MCGOVERN: Your Honor, if I could, just so the
15 record is clear and there's no confusion. We do not have P853
16 as that Slack channel document. It's a completely different
17 document as Plaintiffs' exhibit. We can sort this out later,
18 but we would just like to make that this confusion clear.

19 THE COURT: We'll correct that on the record outside
20 the presence of the jury.

21 MS. MCGOVERN: Thank you.

22 MR. FREEDMAN: Absolutely.

23 BY MR. FREEDMAN:

24 Q. I'm back at the native of P856 because the Court asked to
25 see the actual email file.

1 The email is craig.wright@hotmail.com. Do you see that?

2 A. Yes, I see. That's the shared address Slack CEO account.

3 Q. Did you have access to this address, Dr. Wright?

4 A. I could use it, yes, and my EA and a few other people did
5 too.

6 Q. And you allowed your name to be associated with that
7 account, correct?

8 A. That's generally what a CEO's account is.

9 MR. FREEDMAN: Your Honor, Plaintiffs offer P856 into
10 evidence.

11 MS. MCGOVERN: No objection.

12 THE COURT: Admitted into evidence.

13 (Plaintiffs' Exhibit 856 received into evidence.)

14 MR. FREEDMAN: Your Honor, if I could check with my
15 team for a minute. I think that might be all the document
16 module. I think we might be through. Can I just have one
17 moment?

18 THE COURT: Yes. Of course.

19 (Pause in proceedings.)

20 MR. FREEDMAN: Okay. Your Honor, just one correction,
21 addressing Ms. McGovern's correction. This will be P853.2.

22 Ms. Vela, can you put it on for just counsel and the
23 witness.

24 853 is a compilation. The Court's only admitted one
25 and we were trying to get one more added from P853. This is

1 the one we would like to add. No. That's the wrong portion of
2 the document. Can you zoom out, please.

3 There.

4 BY MR. FREEDMAN:

5 Q. Dr. Wright, this is your Slack address, Slack account?

6 A. Yes. You're talking about the wrong Dave, though.

7 Q. Okay. And here you say -- you're talking about Dave and
8 coding?

9 A. No. I'm talking about Dave in 2001. This is not the same
10 Dave. Sorry. I'm talking about a Dave. I met Dave in 2003.
11 In 2001, I had a company in Australia. I had people called
12 Dave working for me. Many people in my life have been called
13 Dave. There is Dave Jensen, who was a director. Dave
14 Dornbreg, who was a director with me. I could name all the
15 Daves in my life. I don't think anyone's interested.

16 Q. Okay. Dr. Wright, you say he was --

17 MR. FREEDMAN: Your Honor, Plaintiffs offer P853 --
18 and this will be the second image from that P853.2, into
19 evidence.

20 MS. MCGOVERN: No objection, Your Honor.

21 THE COURT: Admitted into evidence.

22 (Plaintiffs' Exhibit 853.2 previously received into
23 evidence.)

24 MR. FREEDMAN: Take that down, please, Ms. Vela.

25 Thank you.

1 BY MR. FREEDMAN:

2 Q. Dr. Wright, last week we spent some time on whether Dave
3 Kleiman was part of the Satoshi Nakamoto partnership. Do you
4 recall that?

5 A. Not the way you're saying it, but I recall we went over
6 these things.

7 Q. You denied it, right?

8 A. Well, because it's not true.

9 MR. FREEDMAN: All right. Ms. Vela, for just the
10 witness and counsel, we're going to look at another part of
11 P853, please.

12 (Pause in proceedings.)

13 BY MR. FREEDMAN:

14 Q. Dr. Wright, do you see this is your Slack account and the
15 "Satoshi trio" is mentioned?

16 A. Sorry. I'm looking for a "Satoshi trio."

17 MR. FREEDMAN: Ms. Vela, can you highlight "Satoshi
18 trio." It's about halfway down the page. "I wonder if the
19 Satoshi trio."

20 BY MR. FREEDMAN:

21 Q. And then you respond to that message, Dr. Wright?

22 A. No. I responded to the general communications. So I don't
23 know if you know how chats work, but you don't always
24 respond -- when you start responding, you're not wait, next;
25 wait, next. So sometimes you'll see six or seven different

1 questions before a response. So no.

2 MR. FREEDMAN: Your Honor, Plaintiffs offer P853.3.
3 So this will be the third image from P853 into evidence.

4 MS. MCGOVERN: No objection.

5 THE COURT: Admitted into evidence.

6 (Plaintiffs' Exhibit 853.3 received into evidence.)

7 MR. FREEDMAN: Please publish to the jury.

8 BY MR. FREEDMAN:

9 Q. Dr. Wright, someone on your Slack channel says: "I wonder
10 if the Satoshi trio all dreamed of the same Bitcoin future."
11 And you respond: "Dave K. did."

12 Do you see that?

13 A. No. I see: "Kleiman was probably more on the
14 implementation side," and that's what he did.

15 Q. He implemented Bitcoin for you?

16 A. No. He didn't implement. He implemented machines. You
17 don't implement code. So Dave ran machines.

18 Later on, in 2011 and 2012, he helped with a number of
19 things, as I've stated, and he helped me with machine design in
20 2012.

21 Q. Dr. Wright, you're aware that the Plaintiffs in this case
22 have alleged that you and Dave Kleiman mined Bitcoin together,
23 correct?

24 A. Yes. I'm completely aware that you like to make up
25 something that didn't exist until 2010. So yes, I recognize

1 that you're making a claim that is provably falsifiable, that
2 you are using fallacia et album nigrum, or black-and-white
3 fallacy. Basically you're believing one thing or the other.
4 Nothing in the middle. Everything has to be something and you
5 can't follow other ways. So, unfortunately, utterly false.

6 Q. And, Dr. Wright, you realize that when the Plaintiffs say
7 that, they mean that you two agreed to mine Bitcoin together
8 for the joint benefit of the partnership, correct?

9 A. No. There was no partnership, as I stated.

10 And if you look at that document earlier -- I don't know if
11 you noticed, but in the BAA document, that he wanted to get in
12 today, it says W&K is a joint venture not between Craig and
13 Dave, but between Dave, a vet, and an Australian incorporated
14 company. I had an incorporated company. That formed a joint
15 venture. That's why Information Defense. And his evidence
16 that he said doesn't exist, he's actually put it in today.
17 Thank you.

18 And I had a number of companies in 2009. They were all
19 founded. They all have public records. So if you wanted to
20 know who the shareholders are, you go to ASIC, which is the
21 Australian company register. You go there and every company
22 registered in Australia has all of the directors, all of the
23 shareholders, all the other people. You have the amount of
24 capital paid. Easily just look it up and you'll find out who
25 was there with me in the beginning.

1 Q. Dr. Wright, you deny that Dave and you mined Bitcoin
2 together, correct?

3 A. As I said, nobody mined Bitcoin together. Bitcoin was
4 designed -- as I said, it's a unilateral contract. It's a
5 beautiful system where you encourage people to go out there and
6 keep the system running through economic means. It was really,
7 really difficult. Like I said at the beginning, earlier today,
8 I was trying to give away Bitcoin just about. One hundred
9 dollars for 50,000 Bitcoin, and I could not get takers in 2009.

10 So we're talking about a system: "Not I'm mining together,
11 it's going to be worth." No. I'm talking about a system I
12 spent millions, sunk my life into, ended up getting divorced
13 because of, and could not give away.

14 Q. Dr. Wright, we've looked at documents which showed that you
15 and Dave were mining. Do you recall those?

16 A. No. We don't show any: "Dave and I were mining." They
17 show I mined. I mined into companies that I founded. I
18 believed Dave was mining. I asked Dave to mine. I asked my
19 uncle, my mother, my sisters, people in companies. I even had
20 a trip to Microsoft. So I tried to flub Bitcoin off to
21 Microsoft.

22 Between September and October 2008, I had meetings with the
23 Bing team. I was there in the BlueHat Conference. I met with
24 the founders of like the Bing part of it. I met the browser
25 people, the browser team. I wanted basically to have Microsoft

1 run Bitcoin, like they did with -- they potentially ran eCash,
2 but it all fell apart.

3 I imagined that if that happened I would have a global
4 system where micropayments actually worked. Unfortunately,
5 right at the end of October, there was a sort of freeze because
6 of the whole global financial crisis, and Microsoft basically
7 said: "Sorry. We can't do anything," and I ended up having to
8 launch myself.

9 MR. FREEDMAN: Ms. Vela, can you put up P146, please,
10 for the witness and counsel.

11 BY MR. FREEDMAN:

12 Q. See this is an email from yourself to John Chesher, your
13 CFO; Andrew Sommer, your lawyer; and Ms. Watts, your wife?

14 A. Yeah, looks like that.

15 Q. And you discuss Dave Kleiman. Do you see that?

16 A. It said: "Dave." I'd say that would be Mr. Kleiman, yeah.

17 MR. FREEDMAN: Your Honor, Plaintiffs offer P146 into
18 evidence.

19 MS. MCGOVERN: No objection, Your Honor.

20 THE COURT: Admitted into evidence.

21 (Plaintiffs' Exhibit 146 received into evidence.)

22 MR. FREEDMAN: Ms. Vela, can you highlight for us
23 Dr. Wright's statement on the third paragraph: "As noted in
24 the contracts, Dave mined."
25

1 BY MR. FREEDMAN:

2 Q. Dr. Wright, in previous days when I showed you documents
3 about Dave mining, you said that that was him mining Testnet
4 Bitcoins on supercomputers that he and you designed; is that
5 correct?

6 A. That's not what I said. I said he was helping in the
7 companies to choose machines, et cetera. So did he design the
8 supercomputers? No.

9 I also said that the mining was done on those machines.
10 Dave didn't do that personally. The whole thing with having
11 staff is staff do all this. So when I keep saying I had these
12 people in Australia and these people overseas, that doesn't
13 mean that it's all Dave or me, when -- I have a team of people
14 who do everything; like I said, a CTO, a CIO, a security
15 person, an exchange person, a database person, software
16 developers. So I didn't actually do any of those roles. I
17 hired people who did. So technically, I instructed people.
18 People did things, somewhere in Australia, somewhere in all
19 different countries.

20 Q. Did Dave mine the Testnet Bitcoins?

21 A. Dave helped manage that process. He talked to other
22 people. So it depends on how you look at what that meant. If
23 he instructed people to do it, then that's a different issue.

24 Q. He was an active part of the team that mined Testnet
25 Bitcoins with supercomputers. Is that your testimony?

1 A. Yes. He was actually part of all that. That's correct.

2 MR. FREEDMAN: Ms. Vela, can you please play clip 105
3 from Dr. Wright's April 4th, 2019 deposition. For the record,
4 that's Page 382, lines 18 through 23.

5 (Video played.)

6 BY MR. FREEDMAN:

7 Q. Dave died before your supercomputers were even operating,
8 Dr. Wright.

9 A. No. CO1N was actually done in 2012. But CO1N was only
10 part of the entire system. The later computer was called
11 Tulip. The first computer was launched in December 2012. The
12 Tulip computer was the one launched April/May of 2014.

13 So if you consider the smaller system, then no, he was
14 there. If you consider the larger system, he was dead.

15 Q. Dr. Wright, the truth is that Dave Kleiman was mining
16 Bitcoin in at least March of 2009, correct?

17 A. Incorrect. Dave was in the hospital all of that time.

18 Now, this is what the wonderful thing of my system is. If
19 you look right up until 2010, the difficulty that was explained
20 by Mr. Antonopoulos was one. Now, one difficulty means about
21 175 computers needed to be mined before it went over that and
22 it became more difficult. I only ran 69 computers. There were
23 some in my church. There were some that my uncle had, other
24 people had. But even then, it sat below the threshold.

25 So technically, if one had come along, they could have

1 gotten more Bitcoin. There are only about two-thirds of the
2 Bitcoin that were to be distributed done in that first year
3 that were meant to be. So it took a lot longer because I just
4 couldn't get people to come in and mine.

5 So you can actually look at the difficulty level and you
6 can analyze this. People say -- like Mr. Antonopoulos said:
7 "We don't know." We do know. Because every type of CPU has a
8 hash signature. You can actually work out how many hash per
9 second a particular type of CPU from a particular type of
10 machine. I actually did.

11 And there were no GPU mining. So GPU mining was Laszlo and
12 also Shadders. Steve Shadders now works for some of the
13 companies I'm with and he's starting his own new company in
14 those areas. He helped found this. And Laszlo and others
15 helped do GPU mining. That wasn't in 2010. So there's no GPU
16 mining, all CPUs.

17 So if you go back and you look at the intel tables, you
18 will see how many calculations per second any particular
19 machine can do. You'll work out that even if Dave was mining,
20 then his mining on a laptop would be insignificant. To mine on
21 a laptop at that stage, you could actually work out exactly how
22 many Bitcoin he would average over time. None of this we
23 guesstimated. You can work it out exactly.

24 And guess what? There's no evidence of it. If you analyze
25 the blockchain, which back at the time I didn't do, you can

1 tell. That's the wonderful thing with this public record here.

2 MR. FREEDMAN: Madam court reporter, can I bother you
3 to read the question and the first sentence of Dr. Wright's
4 response? I don't remember it.

5 (Read back.)

6 MR. FREEDMAN: Ms. Vela, for the witness and counsel,
7 can you please bring up Impeachment Exhibit RF-10.

8 Could you zoom out a little bit.

9 (Pause in proceedings.)

10 MR. FREEDMAN: I can't see it on my screen.

11 It's up.

12 No. You need to zoom out a little bit.

13 Can you pull it down for a second.

14 (Pause in proceedings.)

15 MR. FREEDMAN: Okay.

16 No. No. No.

17 Perfect.

18 Thank you.

19 MR. FREEDMAN: Your Honor, we would like to publish to
20 the jury.

21 MS. MCGOVERN: No objection, Your Honor.

22 THE COURT: All right.

23 BY MR. FREEDMAN:

24 Q. Dr. Wright, your Slack channel, your posting: "Dave, he
25 started mining in March 2009."

1 A. As I had stated to you earlier, I talked to Dave. I tried
2 to get him involved with mining. My understanding was Dave
3 told me: "Yes, I've mined." At that stage, I had not checked
4 anything.

5 It's a public record. I actually have now gone back and
6 I've looked at the amount of mining being done, and there's no
7 evidence of it. I had hoped Dave had mined. I had wanted Dave
8 to mine. I had wanted everyone to. But unfortunately, he
9 didn't.

10 MR. FREEDMAN: Thank you, Ms. Vela.

11 BY MR. FREEDMAN:

12 Q. Dr. Wright, we've looked at numerous documents from the
13 Australian Taxation Office showing that you previously told
14 them that Dave Kleiman funded the Tulip Trust with Bitcoin. Do
15 you recall those documents?

16 A. No, I don't.

17 MR. FREEDMAN: Ms. Vela, can you please put up P607.
18 It's in evidence.

19 Let's go to Page 49.

20 Zoom in on Paragraph 271 for Dr. Wright.

21 BY MR. FREEDMAN

22 Q. The bottom, second word from the bottom, second to the last
23 sentence: "But Dr. Wright has also stated that the Trust's
24 Bitcoin come from both him and Mr. Kleiman."

25 Do you see that?

1 A. I see what they wanted to put in their thing. But no, it's
2 not correct.

3 MR. FREEDMAN: Thank you, Ms. Vela.

4 BY MR. FREEDMAN:

5 Q. Dr. Wright, you recall that you -- that we looked at the
6 Tulip Trust document that was dated October 2012?

7 A. I don't recall which one's which. Sorry.

8 MR. FREEDMAN: Ms. Vela, can you please put up P036.

9 BY MR. FREEDMAN:

10 Q. Dr. Wright, this document is dated 23rd of October, 2012.
11 The document made it seem --

12 MS. MCGOVERN: Your Honor, we would like to pose an
13 objection to this repeated line of questioning to go over the
14 evidence again. This is the fourth day of testimony. We
15 object.

16 THE COURT: It is in evidence. I certainly am not
17 going to allow you to repeat the questions that were asked. So
18 what is it that you're asking, Mr. Freedman?

19 MR. FREEDMAN: Your Honor, I'm just establishing a
20 foundation for -- I have another document to come in.

21 THE COURT: It's overruled. You may continue.

22 MR. FREEDMAN: Can we publish it?

23 Thank you.

24 BY MR. FREEDMAN:

25 Q. And, Dr. Wright, you recall that we saw emails between

1 Denis Mayaka and yourself purchasing the Tulip Trading Company
2 two years after this document was dated?

3 A. No, we did not.

4 Q. And, Dr. Wright, while you claim that the Tulip Trust is
5 created in 2012, in the document there's actually a letter
6 stating that Tulip Trading has never entered into any contracts
7 before 2014; isn't that correct?

8 MS. MCGOVERN: Objection. Asked and answered.

9 THE COURT: Overruled.

10 THE WITNESS: That is completely fallacious, as
11 normal.

12 MR. FREEDMAN: Ms. Vela, can you put -- let's hold on
13 to P036 for a moment. Can we bring up P869. It's not in
14 evidence yet, so just for counsel and the witness.

15 BY MR. FREEDMAN:

16 Q. Dr. Wright, do you see this is an email from Abacus
17 Offshore to yourself attaching various documents relating to
18 Tulip Trading, Limited?

19 A. It's to the corporate account, and yes, I get all of these
20 things sent on a periodic basis.

21 MR. FREEDMAN: Your Honor, Plaintiffs move P869 into
22 evidence.

23 MS. MCGOVERN: No objection.

24 THE COURT: Admitted into evidence.

25 (Plaintiffs' Exhibit 869 received into evidence.)

1 BY MR. FREEDMAN:

2 Q. So on the left we've got the Tulip Trust, created by --

3 MR. FREEDMAN: Ms. Vela, can you highlight "Tulip
4 Trading, Ltd."

5 BY MR. FREEDMAN:

6 Q. Deed allegedly entered into in October 2012.

7 MR. FREEDMAN: Ms. Vela, on the right hand, can you
8 please bring us to the 13th attachment, the letter of
9 non-activity.

10 BY MR. FREEDMAN:

11 Q. So, Dr. Wright, here's a letter from Abacus Seychelles, the
12 company that sold you Tulip Trading, dated 21st of October,
13 2014. It's titled "Tulip Trading, Ltd." It's the same name as
14 in the left-hand side of the company that allegedly created the
15 Tulip Trust in October of 2012.

16 It says: "This is to confirm that the above-referenced
17 company has never traded or entered into any contracts or
18 obligations whatsoever and, consequently, this company has no
19 assets or liabilities."

20 Do you see that?

21 A. Yes, I do. And that's in error. But the other one's not a
22 contract. It's a deed of trust.

23 Q. Dr. Wright, I asked you if this trust document was a
24 forgery and you denied it. Do you recall?

25 A. The trust document is not a forgery. It was created by

1 lawyers in Australia in 2012, not myself, and it has been in a
2 2012 Australian Tax Office court case. So it's really hard to
3 make it up in 2012 and then say that it's forged. I mean --
4 actually saying that the wrong way. It's really hard to forge
5 something that I used in a 2012 case court case in 2014. You
6 cannot create something in 2014 that you have used in 2012. I
7 mean, I'm not sure if you don't get that, but --

8 Q. Dr. Wright, you understand it's the Plaintiffs' case in
9 this case that you have made up these trusts, they're fake?

10 MS. MCGOVERN: Objection, Your Honor. Asked and
11 answered.

12 THE COURT: Overruled.

13 THE WITNESS: No. Actually, in a 2004 court case, the
14 transcript will show that I already mentioned this. So if you
15 go into a 2004 court case and look at the transcript, and I've
16 mentioned the trust, and then you go into a 2006 tax office
17 audit and it's mentioned, and then a 2008 and a 2009 and a 2010
18 and a 2011 and a 2012 and a court case that I finally won in
19 the beginning of 2013, no. Sorry. People might want it to be
20 fake, people might try and set things up on me, but sorry.
21 It's really, really hard to fake something that is in public
22 record before the date.

23 BY MR. FREEDMAN:

24 Q. Dr. Wright, I expect your lawyers will show the jury this
25 transcript --

1 MS. MCGOVERN: Objection, Your Honor.

2 THE COURT: Sustained.

3 BY MR. FREEDMAN:

4 Q. Dr. Wright, isn't it true that you have admitted -- that
5 you have admitted that you have created fake trusts?

6 A. No. I have not admitted that I created fake trusts. I
7 said that I created trusts to ensure that the -- well,
8 prosecution from the tax office was not successful. I created
9 something where I moved assets overseas because I had the tax
10 office issuing a bankruptcy notice.

11 What happened and why this occurred was because I got
12 tipped off by Andrew. Andrew, my lawyer. He said, basically,
13 in June 2011: "The tax office are going to issue bankruptcy
14 proceedings." He said: "I can't tell you this. You haven't
15 heard it from me." Technically, he's probably not happy that I
16 said that now. But the whole thing here was, I then
17 constructed, well, basically a movement of assets in an
18 existing trust. I locked away control, making sure -- the
19 whole reason for 2020 is if I had control over those assets
20 before 2020, then the tax office could basically reverse the
21 transfers. They could take my assets.

22 So why 2020? Because if I didn't win -- and the way that
23 the tax office played this was on the Information Defense
24 transfer of assets, intellectual property, et cetera, they
25 tried to bankrupt me, literally. They issued bankruptcy

1 proceedings. That would have given them all of the control of
2 my assets, including Bitcoin, and if they did that, that would
3 have shut down my whole thing and stopped my whole life's work.

4 I moved that knowing that they were trying to bankrupt me,
5 so that if they did, it was outside of any legal avenue for
6 them to take it. I moved that then because of that. And yes,
7 those bankruptcy proceedings are public and, yes, eventually
8 what they wanted to do, which I think is really dirty, is if
9 they bankrupted me, they appoint an administrator. That
10 administrator has the right to close my court case, the one I
11 won. But if they closed it, I lose.

12 So rather than letting me have my day in court, they wanted
13 to close my company -- close my case and win, which I think is
14 dirty. So I moved my assets. That's why I went before the
15 GAAR panel as well, several times, like the General
16 Anti-Avoidance Review Panel, because they tried to pull it
17 apart. So that's my answer to it.

18 Q. What was the question, Dr. Wright?

19 MS. MCGOVERN: Objection, Your Honor.

20 THE COURT: Sustained.

21 MR. FREEDMAN: Ms. Vela, can you please put up P853
22 and what we'll call P853.4. So this will be the fourth part of
23 that exhibit we'll be seeking to admit.

24 Just for counsel and the witness, please.

25 (Pause in proceedings.)

1 MR. FREEDMAN: Can you zoom up, please.
2 Sorry. Up meaning -- no, the other way.
3 Down. Down.
4 More.
5 Okay. Wait. A little farther up.
6 One more.
7 Wait. Wait. Stop.
8 Okay. A little farther up.
9 No. No.
10 Down.
11 Okay. There we go.

12 BY MR. FREEDMAN:

13 Q. Dr. Wright, do you see somebody named --

14 MR. FREEDMAN: Ms. Vela, can you just zoom in to --
15 no. No. No.

16 You zoom up now -- now you got to scroll up again.
17 No. This way. Bring the document this way.
18 All right. There we go.

19 BY MR. FREEDMAN:

20 Q. Dr. Wright, do you see somebody called Timothy asks you a
21 question about real, fake, or multiple, and you respond below
22 that?

23 A. I'm responding to a number of things that are --
24 (Court reporter interruption.)

25 THE WITNESS: I am responding to multiple things in a

1 single thing. So no, I'm actually not responding the way
2 you're thinking.

3 MR. FREEDMAN: Ms. Vela, can you please highlight Dr.
4 Wright's response.

5 And, Your Honor, Plaintiffs' offer P853.4 into
6 evidence.

7 THE COURT: Any objection?

8 MS. MCGOVERN: No objection, Your Honor.

9 THE COURT: All right. Page 4 admitted into evidence.
10 (Plaintiffs' Exhibit P853.4 received into evidence.)

11 MR. FREEDMAN: Can we publish to the jury?

12 BY MR. FREEDMAN:

13 Q. Dr. Wright, this is your Slack channel again. You get
14 asked by somebody named Tomothy: "Wait. I get so gosh darn
15 confused. So you are suggesting that there's a separate real
16 trust and then a fake trust or multiple fake trusts?"

17 And, Dr. Wright, you respond: "Real and fake."

18 Do you see that?

19 A. Not the way you're saying and not in that order, and no.
20 That's more questioning.

21 MR. FREEDMAN: Ms. Vela, can you scroll down on the
22 page. So I'd like to see what was posted underneath. So there
23 we go.

24 Keep going, please. Keep going.

25 There we go.

1 BY MR. FREEDMAN:

2 Q. Dr. Wright, somebody says -- God Emperor of Dunes asks the
3 question: "Why the fake trust? To throw people off?"

4 And you say: "A hundred thousand BTC plus."

5 Do you see that, Dr. Wright?

6 A. No. We're answering two different things. That's talking
7 about price of Bitcoin that people are talking about. So
8 again --

9 Q. Thank you.

10 MS. MCGOVERN: If you can please let him respond to
11 the question.

12 THE WITNESS: No. They are not question and answer
13 the way you're going. Sorry. Wrong.

14 BY MR. FREEDMAN:

15 Q. Dr. Wright, you've previously said during your testimony
16 that your documents have been hacked. You recall that?

17 A. Computers are hacked and documents have been changed. So
18 you're confounding the things a little bit. So yes, I have had
19 a number of computers hacked. I have had a number of staff do
20 incidents. We have fired staff. Some of the computers that
21 you have got are from staff that I fired.

22 I've got a number on Twitter still complaining about me,
23 saying how evil I was, including one who went off in a bender,
24 disappeared for a month, turned up in a hotel talking about how
25 much money he's going to make from me and if we don't pay him

1 lots of money, X, Y and Z is going to be released. So lots of
2 things have happened. Welcome to corporate life.

3 Q. Dr. Wright, isn't it true that you were an early hacker, a
4 true hacker?

5 MS. MCGOVERN: Objection, Your Honor. Relevance, 403.

6 THE COURT: Sustained.

7 MR. FREEDMAN: Ms. Vela, for just the witness and
8 counsel, can you put P770 on the screen.

9 BY MR. FREEDMAN:

10 Q. Dr. Wright, this is an email from yourself to Ms. Lynn
11 Wright --

12 MS. MCGOVERN: Objection, Your Honor. This is exactly
13 the objection that we've just made with respect to 403 and
14 relevance. There's no foundation that links this to any
15 relevance. It's improper character, Your Honor.

16 MR. FREEDMAN: Your Honor, I'm attempting to lay a
17 foundation, and we're obviously going to be careful not to
18 discuss the document until it's admitted into evidence.

19 MS. MCGOVERN: Your Honor, we can approach or I
20 could --

21 THE COURT: Let me look at the contents.

22 MR. FREEDMAN: Ms. Vela, can you highlight the -- one,
23 two, three, four -- five paragraphs down.

24 MS. MCGOVERN: Mr. Freedman, could you please wait and
25 refrain from referring to anything in the document until it's

1 been addressed by the Court.

2 MR. FREEDMAN: Ms. Vela, can you please highlight --

3 MS. MCGOVERN: This is improper character evidence,
4 Your Honor.

5 THE COURT: The objection is sustained.

6 MR. FREEDMAN: Okay.

7 BY MR. FREEDMAN:

8 Q. Dr. Wright, last week I showed you a list of Bitcoin
9 holdings that you produced. Do you recall that?

10 A. Not in particular, no.

11 MR. FREEDMAN: Ms. Vela, can you please put P554 on
12 the screen. This is in evidence.

13 BY MR. FREEDMAN:

14 Q. Do you recall it now?

15 A. Again, I did not say this was a list of Bitcoin holdings I
16 sustain. I said the first 15 addresses are mine. The rest
17 I've no idea.

18 MR. FREEDMAN: Ms. Vela, can you put that to the left
19 side of the screen and bring up P446. I believe that's in
20 evidence.

21 Is it in evidence, P446?

22 THE COURT: It is in evidence.

23 MR. FREEDMAN: Okay. Then let's publish P446 also,
24 please.

25

1 BY MR. FREEDMAN:

2 Q. Dr. Wright, this filing that was filed on your behalf says:
3 "Dr. Wright notifies the Court that the third party has
4 provided the necessary information and key slice to unlock the
5 crypted file and Dr. Wright has produced a list of his Bitcoin
6 holdings as ordered by the magistrate judge to Plaintiffs
7 today."

8 Do you see that?

9 A. Yes. And as I specified, the first 15 were mine. The
10 others were corporate. So I have testified and I stick by the
11 fact the first 15 are mine. I agree. The others belong to the
12 company. I don't know which ones belong to the company. I
13 testified and I stand by it, the first 15 are mine.

14 Q. Is it your Bitcoin holdings or is it not your Bitcoin
15 holdings?

16 A. The first 15 are my Bitcoin holdings. The first 15.

17 Q. From 15 to 16,000 and change, those are not your Bitcoin
18 holdings?

19 A. As I said, I set up a company and everything after that was
20 in the company. So no. So the thing is, when you set up a
21 company, when companies make assets, you don't own them. You
22 talk about it that way. I don't know if you have ever -- like
23 some of you here have had businesses. When you talk about your
24 business, you technically get it wrong. Because you sit there
25 and you say: "My company, my assets," because you're proud of

1 it. I mean, it's not really correct. It's your company's
2 assets, your group's assets, your other directors' assets.

3 But the truth of the matter is if you're proud of your
4 company, you'd say: "My." You'd say: "What I did. What we
5 did. What our business did." And: "Good. Be proud." I am.

6 Q. Dr. Wright, the companies that own the balance of the
7 Bitcoin on this list, what is their names?

8 A. I don't know if it's all there. I can't verify that.

9 Well, technically I probably could now, but I couldn't at the
10 time. Wright International Investments, Ltd.

11 Q. So Wright International Investments, Ltd. owns all the
12 Bitcoin after block 16 that appears on this list; is that
13 correct?

14 A. I have no idea whether it does or doesn't. I'd been given
15 a list at that time. I forwarded it. My 15 are mine. So I
16 sent those, and they are mine.

17 The other one, the accounts I've now got access to -- and
18 there are 825,050 Bitcoin owned by Wright International
19 Investments, and there are others and other things associated
20 with that as well. It goes beyond that, but that is different
21 assets outside of the scope of what was asked.

22 Q. Dr. Wright, Wright International Investments is wholly
23 owned by the Tulip Trust now, correct?

24 A. The Tulip Trust owns it. Technically, it's not owned by --
25 there are a number of corporate directors. There's a

1 Seychelles company. There's an Antiguan company. There's a
2 Swiss company. Because you have to have different companies to
3 own these things, and we don't live in the Seychelles.

4 So technically there's a trust over the ownership and
5 control. It gets messy, but the simple way of putting it is,
6 yes, the Tulip Trust run by my wife owns it.

7 Q. Isn't it true you purposely made sure you weren't a trustee
8 of these trusts because then people could force you to move
9 coins and could seize assets from you?

10 MS. MCGOVERN: Objection Your Honor. Asked and
11 answered, including the video clip.

12 THE COURT: Overruled.

13 THE WITNESS: Yes. In 2011 when, as I said, the
14 Australian Tax Office wanted to bankrupt me, I made sure that
15 would not happen. So I don't know if anyone's ever had sort of
16 difficulties with the IRS or something like that when they
17 don't like you. The Australian Tax Office is the same.

18 When I talked about Bitcoin, they saw it as the same
19 as every cryptocurrency. Not digital cash. They looked upon
20 it as things like a new Liberty Reserve, a new e-gold, a new
21 way of doing criminal funding. And right from the beginning,
22 right from the start, they called it a hobby. All those
23 documents that he wants to put in say: "Not an enterprise."
24 Not an enterprise means not that it didn't happen, that it
25 wasn't a business, that it's a hobby. They wanted to say that

1 it's all not anything that amounts to anything. Because when I
2 was doing this in 2009, remember, I said Stefan wouldn't take
3 it for even -- 50,000 for a hundred dollars. I could not even
4 give the stuff away. So you try going to the tax office and
5 explaining I've spent \$2 million on this stuff no one will
6 take, and they thought it was a joke.

7 So yes, I worked with my lawyers, I worked with my
8 accountants, and I set up a system that would allow me to
9 structure things, and I moved it legally. I claimed the move
10 on my tax. People don't realize this. I actually put the move
11 from the Australian entity to the overseas entity on my tax
12 form, and I claimed the taxation and I paid the tax on Bitcoin
13 at that stage. So yes.

14 Q. Yes, you've purposely made sure you weren't a trustee of
15 the trust because then people could force you to move coins and
16 could seize assets from you?

17 MS. MCGOVERN: Objection. Asked and answered.

18 THE COURT: Sustained.

19 BY MR. FREEDMAN:

20 Q. Dr. Wright, the 821,050 Bitcoin on that list are worth
21 about \$53.7 billion; isn't that correct?

22 MS. MCGOVERN: Objection, Your Honor. Improper lay
23 opinion regarding damages.

24 THE COURT: Overruled.

25 THE WITNESS: No. They have a market capitalization.

1 They are two different things. Value and capitalization are
2 not the same.

3 BY MR. FREEDMAN:

4 Q. They have a market and capitalization of \$53.7 billion,
5 approximately?

6 A. Yes. But if they move, then the value of BTC will likely
7 tumble. So technically, if any of these early Bitcoin move --
8 the market valuation is premised on Craig Wright will never
9 move his Bitcoin, which is not technically correct, but it
10 won't happen the way you're saying. And when it does, the
11 value of BTC is going to slide. It's going to fall.

12 Q. Dr. Wright, you've said that you have several billion
13 dollars in value now, correct?

14 A. I control that, yes.

15 Q. And in fact, Dr. Wright, it is true that you are a
16 multi-billionaire, correct?

17 MS. MCGOVERN: Objection, Your Honor. 403.

18 THE COURT: Overruled.

19 MS. MCGOVERN: Relevance.

20 THE COURT: Overruled.

21 THE WITNESS: If you want to be honest, I control
22 things in some ways and I have companies that I'm a CEO of.
23 Technically, no. My wife is actually the multi-billionaire.
24 So technically, she's the person who owns it. Yes, myself and
25 my kids are beneficiaries, but I've also put in covenants over

1 the things here. So there's already a covenant over the trust.
2 The value of the trust is covenanted for projects that I said.

3 Now, that is 98 percent of all the value that I own
4 will be used in creating a system. I've said this multiple
5 times. The value, 98 percent of what he's talking about is
6 under a covenant. Not for me, not for my kids; basically for
7 the idea I want. I want to take that money and build a system
8 to take the poorest one billion people on earth and have them
9 in the digital economy. If there's more money left over, I'll
10 work on the second billion people.

11 I will keep spending that money, the 98 percent, which
12 is now in law, now set, under a covenant of deed, irreversible.
13 I will start working on places like Africa, on India, on Asia,
14 on South America, and I will find a way of building digital
15 asset foundations for these people.

16 So in places like Venezuela or India where there are
17 shantytowns, those people don't own property. They live there
18 for 20 years sometimes and don't own it. So under property
19 rules, when you live somewhere and you can prove it, after 12
20 years in most places it becomes yours. There's actually a case
21 where -- in Hyde Park in London -- they paid out a homeless man
22 20 million pounds because he had been living there for 15 years
23 and technically he had a claim over Hyde Park, center of
24 London.

25 I want a system that will enable those poorest billion

1 to have technology that proves immutably they own their
2 shantytown. So the same systems that the economist Hernando
3 Soto talked about where those poor people cannot get
4 microloans, they will own their property. They will own and
5 they will be able to get loans against it. They will be able
6 to interact globally.

7 So technically, although I control those assets, they
8 are bound, and that's what they're bound to, 98 percent of it.

9 MR. FREEDMAN: Your Honor, we object to the response.
10 We have a motion to make.

11 THE COURT: All right.

12 MS. MCGOVERN: Your Honor, he's simply responding to
13 the question. Your Honor, they opened the door and he
14 responded accordingly.

15 THE COURT: You can preserve the objection and do it
16 outside the presence of the jury.

17 Let's continue.

18 MR. FREEDMAN: Ms. Vela, can you please put up RF-2
19 for the witness and counsel.

20 BY MR. FREEDMAN:

21 Q. Dr. Wright, that's your Slack channel, and that first line
22 is your statement --

23 MR. FREEDMAN: Your Honor, we would like to publish
24 this as impeachment. The witness testified it was his wife.

25 MS. MCGOVERN: Objection, Your Honor. Improper

1 impeachment. This does not correct what he's just stated.

2 THE COURT: I agree.

3 You may use it for purposes of impeachment.

4 MR. FREEDMAN: "You may"?

5 THE COURT: You may. You're permitted to.

6 MR. FREEDMAN: Can we please publish to the jury.

7 BY MR. FREEDMAN:

8 Q. Dr. Wright, can you please read the first line of your
9 response to the jury?

10 A. Yes. In 2018 I said: "I am a multi-billionaire."

11 MR. FREEDMAN: Thank you, Ms. Vela.

12 BY MR. FREEDMAN:

13 Q. Dr. Wright, isn't it true that you have said to never feel
14 sorry for a multi-billionaire because they have no need for
15 pity?

16 MS. MCGOVERN: Objection, Your Honor. 403.

17 THE COURT: Sustained.

18 MR. FREEDMAN: Your Honor, we have no further
19 questions of Dr. Wright.

20 THE COURT: All right. Any cross-examination?

21 MS. MCGOVERN: Your Honor, we have no questions of
22 Dr. Wright at this time.

23 THE COURT: All right. Ladies and Gentlemen, you are
24 permitted to ask Dr. Wright any questions. I would just ask
25 that you raise your right hand if you are formulating a written

1 question so we can give you the time that you need.

2 Does anyone have any questions for Dr. Wright? If so,
3 please raise your hand.

4 All right. I see no questions to be asked.

5 Dr. Wright, you may sit with counsel.

6 And if the Plaintiffs will call their next witness,
7 please.

8 THE WITNESS: Thank you, Your Honor.

9 MR. ROCHE: Plaintiffs call Dr. Matthew Edman.

10 THE COURT: All right.

11 All right. Good afternoon, Dr. Edman. If you'll step
12 forward, remain standing. Raise your right hand to be placed
13 under oath.

14 DR. MATTHEW EDMAN, PLAINTIFF WITNESS, SWORN

15 COURTROOM DEPUTY: Thank you.

16 Can you please state your name and also spell it for
17 the record.

18 (Court reporter interruption.)

19 THE COURT: Yes. Let's give everybody some time.

20 (Pause in proceedings.)

21 THE COURT: Go ahead, sir.

22 THE WITNESS: My name is Matthew Edman.

23 M-A-T-T-H-E-W. E-D-M-A-N.

24 THE COURT: And sir, if you'll speak right into
25 microphone.

1 MR. ROCHE: May it please the Court.

2 THE COURT: Of course.

3 DIRECT EXAMINATION

4 BY MR. ROCHE:

5 Q. Good afternoon, Dr. Edman. Would you please introduce
6 yourself to the jury by stating your name and where you live.

7 A. My name is Matthew Edman. I live in New York City.

8 Q. Have you been retained by the Plaintiffs in this case?

9 A. I have.

10 Q. And are you charging for your services?

11 A. I am.

12 Q. At what rate are you charging the Plaintiffs?

13 A. My employer receives 560 an hour for my services in this
14 matter.

15 Q. And can you please tell the jury where you're presently
16 employed.

17 A. I currently work for a consulting firm called Berkeley
18 Research Group in the Cyber Security Investigations Practice.
19 I'm a member of the Cyber Operations and Incident Response
20 Team.

21 Q. And what is your field of expertise?

22 A. My expertise is in digital forensic investigations and
23 cryptographic security.

24 Q. Can you tell the jury what your educational background is.

25 A. Sure. I have a bachelor of science in computer science

1 from Baylor University. I have a master of science in computer
2 science from Rensselaer Polytechnic Institute, and I have a
3 Ph.D. in computer science also from Rensselaer Polytechnic
4 Institute.

5 Q. Rensselaer Polytechnic Institute, that's RPI?

6 A. That is correct.

7 Q. And what was the focus of your research during your Ph.D.
8 studies at RPI?

9 A. My research was mainly focused on the design and analysis
10 of anonymous communications systems and cryptographic security
11 and wireless networks.

12 Q. After completing your graduate studies, did you ever work
13 for an organization called MITRE Corporation?

14 A. I did.

15 Q. And what was your role at MITRE?

16 A. So MITRE is a federally funded research and development
17 center that supports a number of different government agencies.
18 I in particular was assigned to support the FBI's Remote
19 Operations Unit based out of Quantico, Virginia.

20 THE COURT: Dr. Edman, I'm just going to ask you to
21 speak up a little bit louder, sir.

22 Thank you.

23 BY MR. ROCHE:

24 Q. While you were at MITRE Corporation, did there come a time
25 where you worked alongside the FBI?

1 A. Yes.

2 Q. And can you please describe for the jury the work that you
3 did for the FBI while you were at MITRE.

4 A. Right. So I primarily supported the FBI's Remote
5 Operations Unit in Quantico, Virginia.

6 Q. And have you heard during the Defense's presentation
7 references to the dark market Silk Road?

8 A. I have.

9 Q. And what was the Silk Road marketplace?

10 A. Silk Road was a darknet marketplace where users could buy
11 and sell illegal narcotics, among other things, in exchange for
12 Bitcoin.

13 Q. And have any of the investigations you've been involved
14 with involved Silk Road?

15 A. Yes.

16 Q. Can you please describe for the jury the work you did in
17 relation to your Silk Road investigations?

18 A. So the way that Silk Road was built is it was supposed to
19 be impossible to determine where the site was actually hosted,
20 and if the sites -- if you didn't know where the site was
21 hosted, it would have been impossible for law enforcement to
22 determine -- to actually seize the website. So much of my work
23 was focused on trying to identify where Silk Road and its
24 associated infrastructure was hosted.

25 Later in the investigation, once we were able to determine

1 where the site was hosted, I supported the FBI and the
2 Icelandic national police in seizing those Silk Road websites,
3 as well as the Bitcoins that were hosted on wallets associated
4 with the marketplace.

5 Q. So during the seizure of the website, did your work end up
6 involving any criminal prosecutions?

7 A. It did, yes.

8 Q. And can you please describe the work you did involving
9 those criminal prosecutions?

10 A. Sure. So later, as a senior director at FTI Consulting in
11 New York, I was retained by the U.S. Attorney's Office for the
12 Southern District of New York to review various forensic
13 evidence that was collected as part of the Silk Road
14 investigation, identify and extract forensic artifacts related
15 to Bitcoin activity, and conduct analysis to establish
16 significant and ongoing links between the Silk Road marketplace
17 and the defendant, its owner and operator, Ross Ulbricht.

18 Q. I'd like to move forward to the work you did in this case.

19 What were you asked by Plaintiffs to analyze in this case?

20 A. Plaintiffs in this case asked me to review certain
21 documents and determine, to the extent possible, whether or not
22 those documents appear to be authentic.

23 Q. And can you summarize for the jury your findings.

24 A. My findings in general were that many of the documents that
25 I reviewed were not authentic.

1 Q. And I didn't catch -- can you repeat the last part of that?

2 A. Sure. So many of the documents that I reviewed were not
3 authentic.

4 Q. Before we get into the substance of your analysis as to how
5 you drew those conclusions, can you please tell the jury the
6 methods you used to determine that certain documents were not
7 authentic.

8 A. Sure. So my methodology generally included an analysis of
9 the content and structure of the document, extracting and
10 reviewing metadata that's embedded within the documents and for
11 certain documents that contained cryptographic signatures, and,
12 when present, I would extract and analyze those as well.

13 Q. Let's break that down. I heard three primary modes of
14 analysis.

15 You said content. You analyzed -- I may need to get a new
16 marker. But can you describe for the jury what the content of
17 a document relates to.

18 A. That's basically the portions of the document that you can
19 see, that's human readable.

20 THE COURT: Mr. Roche, I'm just going to stress for
21 Dr. Edman -- because his voice is trailing off. So if you
22 could just project your voice, sir, we would appreciate it.

23 Thank you.

24 BY MR. ROCHE:

25 Q. And in addition to a document's content, you said you

1 analyzed metadata. Can you tell the jury what metadata is.

2 A. Sure. So metadata is basically data about data. In the
3 context of the documents that are reviewed, it's -- they
4 provide information about when the document was created, if or
5 when it was modified. In some instances, who modified the
6 document.

7 Q. And were some of those attributes some of the things we
8 looked at during the testimony of Craig Wright?

9 A. Yes.

10 Q. And finally, you said the third mode of analysis was
11 cryptographic signatures. Can you describe to the jury what a
12 cryptographic signature is.

13 A. A cryptographic signature is kind of like an electronic
14 stamp or a seal on a document that someone -- say if you're
15 sending an email, you use your private key to create the
16 signature, such that anyone who receives this document can
17 verify that it came from you and that it hasn't been modified
18 since you sent it.

19 Q. So is a cryptographic signature sort of like a digital
20 stamp?

21 A. In essence, yes.

22 Q. So we're going to look at a lot of documents, and we've
23 already looked at a lot of documents in this case, and the
24 documents used these three modes of analysis. But before we
25 dive into that analysis, is there any doubt in your mind that

1 every single document we are going to examine contains a
2 forgery of some kind?

3 A. No.

4 Q. Do you know whether any of the Defendant's experts have
5 opined that the documents you say are forgeries are in fact
6 authentic?

7 A. They have not. To my knowledge, they have not even
8 analyzed the documents.

9 Q. They haven't even analyzed the documents?

10 A. That's my understanding.

11 MR. ROCHE: Dorian, can we bring up Plaintiffs'
12 Exhibit 823 -- actually, if we can bring that up in the --
13 perfect.

14 One second.

15 (Pause in proceedings.)

16 MR. ROCHE: I believe 823 is already in evidence.

17 THE COURT: It is.

18 BY MR. ROCHE:

19 Q. Okay. Dr. Edman, what is Plaintiffs' Exhibit 823?

20 A. This is a PDF that purports to represent an email from Dave
21 Kleiman to Craig S. Wright on December 10, 2012.

22 Q. And that's what's highlighted on the top?

23 A. Correct.

24 MR. ROCHE: Dorian, could you blow up the fifth
25 paragraph that is highlighted in red.

1 Just can you call it out or -- perfect.

2 BY MR. ROCHE:

3 Q. It reads: "I love you like a brother, Craig, but you are a
4 really difficult person to be close to. You need people. Stop
5 pushing them away. You have over one million Bitcoin now in
6 the trust. Start doing something for yourself and this family
7 you have. Later." Signed: "Dave."

8 Dr. Edman, in your opinion, is Plaintiffs' Exhibit 823 a
9 forgery?

10 A. Yes.

11 Q. Okay. We're going to write up here 823, and we're going to
12 refer to that as a forgery.

13 MR. ROCHE: And, Dorian, can we now not publish to the
14 jury 823.2 and 823.3. And if we can bring those up side by
15 side for Dr. Edman.

16 BY MR. ROCHE:

17 Q. Dr. Edman, what is the two documents we're looking at on
18 the screen?

19 A. I think the document on the left side of the screen is not
20 823.

21 MR. ROCHE: Oh, okay. Let's take the document on the
22 left side down and let's just look at 823.2.

23 THE WITNESS: Okay. That looks right. These are PDF
24 metadata objects that I extracted from 823.

25 MR. ROCHE: Okay. Your Honor, we would move to admit

1 823.1 and 823.2 into evidence.

2 MR. RIVERO: Without objection, Your Honor.

3 THE COURT: All right. Admitted into evidence.

4 (Plaintiffs' Exhibits 823.1 and 823.2 received into
5 evidence.)

6 MR. ROCHE: Let's take those down.

7 I think you had it up -- oh, please, let's not publish
8 it to the jury yet. 823.3.

9 BY MR. ROCHE:

10 Q. Dr. Edman, we have Plaintiffs' Exhibit 823.3. What is
11 823.3?

12 A. 823.3 shows analysis of a cryptographic signature that was
13 contained within 823.

14 MR. ROCHE: Your Honor, at this point we would like to
15 move 823.3 into evidence.

16 MR. RIVERO: Your Honor, one moment. I didn't hear
17 the witness to begin with. I'm not sure what he said. If we
18 could have it read back or hear it.

19 THE COURT: Certainly.

20 Yvette, do you want to read back Dr. Edman's answer?
21 (Read back.)

22 MR. RIVERO: No, Your Honor.

23 THE COURT: Admitted into evidence.

24 (Plaintiffs' Exhibit 823.3 received into evidence.)

25 MR. ROCHE: And, Dorian, if we can go back to the

1 slide and publish that to the jury.

2 BY MR. ROCHE:

3 Q. Dr. Edman, we have 823.2 on the screen. This document
4 looks pretty dense. So can you explain what this is, and is it
5 the metadata or is it a cryptographic signature we're looking
6 at here?

7 A. This one is metadata.

8 Q. And let's walk through your analysis of this metadata. How
9 did you determine that forgery number one was in fact a forgery
10 from 823.2?

11 A. There are multiple components, but first I looked at the
12 metadata embedded within the document. So if you look at line
13 14, it shows that this document was created on March 26th, 2014
14 in time zone known as UTC+11. And then line 13 shows that this
15 document was modified about a minute and a half later. Lines
16 22 through 26 identify the creator of the document as a user
17 named Craig Wright.

18 Q. You mentioned the time zone UTC+11. Is there anything
19 noteworthy about that time zone?

20 A. So UTC+11 is a time zone predominately associated with
21 Eastern Australia.

22 Q. And were you here when Dr. Wright testified that he lived
23 in Australia during that time?

24 A. I was, yes.

25 MR. ROCHE: Okay. And, Dorian, if we could go to the

1 next slide, please.

2 BY MR. ROCHE:

3 Q. This is -- you said you also examined a cryptographic
4 signature related to forgery number one. Can you tell the jury
5 where the cryptographic signature is located in this document.

6 A. Sure. It's located at the bottom of the document, between
7 the lines that say: "Begin PGP signature" and then continues
8 on the other side to: "End PGP signature."

9 Q. Okay. So that's the full -- what Dorian has just pulled
10 there, that's the full cryptographic signature?

11 A. Correct.

12 Q. And how does somebody create -- it looks like a long string
13 of text. What's the significance of this and how does somebody
14 create a cryptographic signature?

15 A. So there are a number of different tools for creating
16 cryptographic signatures. In this particular instance, the
17 version line at the top suggests that this cryptographic
18 signature was created with an open source software tool known
19 as GnuPG --

20 (Court reporter interruption.)

21 THE WITNESS: Gnu -- G-N-U-P-G.

22 MR. ROCHE: Dorian, if we could go to the next slide,
23 please.

24 BY MR. ROCHE:

25 Q. Can you tell the jury how you analyzed the cryptographic

1 signature in 823 and what 823.3 shows about that signature?

2 A. I used the GnuPG software to analyze the cryptographic
3 signature. Even though the signature text kind of looks random
4 in the top left there, there's actually structure, and the
5 GnuPG software lets me extract and analyze information from
6 that structure.

7 So if you look at line 35 on the right, the signature
8 includes a time stamp that indicates the signature was made on
9 February 28th, 2014.

10 Q. So the cryptographic signature in forgery one, email sent
11 from Dave to Craig, wasn't created until February 28th, 2014?

12 A. Correct.

13 Q. Do you believe this signature was created by Dave Kleiman?

14 A. I do not.

15 Q. Why not?

16 A. My understanding is Dave had been dead for almost a year at
17 the time the signature appears to have been created.

18 Q. So what does that tell you about the individual or
19 individuals who controlled that signature?

20 A. It suggests that someone else had access to the private key
21 aside from Dave that was used to create this signature.

22 Q. And did you review any other documents that indicate that
23 forgery number one is in fact a forgery?

24 A. I did.

25 MR. ROCHE: Dorian, if we could go to the next slide,

1 which I believe was admitted as Plaintiffs' Exhibit 799.

2 BY MR. ROCHE:

3 Q. Dr. Edman, what is this document?

4 A. This document appears to be a draft email which contains
5 two messages. The one at the top is very similar to the
6 message that we were looking at in 823, and then the message at
7 the bottom appears to be separate but includes a cryptographic
8 signature.

9 Q. And, Dr. Edman, were you here earlier when Mr. Freedman
10 questioned Dr. Wright about this exhibit?

11 A. I was.

12 Q. And you mentioned there's a cryptographic signature. I see
13 that's on the second page. Did you examine that cryptographic
14 signature?

15 A. I did.

16 MR. ROCHE: Dorian, if you could bring up and not take
17 down -- we're going to show Dr. Edman an exhibit that's not yet
18 admitted. 799.1.

19 BY MR. ROCHE:

20 Q. Dr. Edman, what is Plaintiffs' Exhibit 799.1?

21 A. This is the GnuPG output of analyzing the signature in 799.

22 Q. And did you extract this data as part of your review of
23 forgery number one?

24 A. I did.

25 MR. ROCHE: Your Honor, we move to admit 799.1 into

1 evidence.

2 MR. RIVERO: Without objection.

3 THE COURT: All right. Admitted into evidence.

4 (Plaintiffs' Exhibit 799.1 received into evidence.)

5 MR. ROCHE: Dorian, if we could go back and go to the
6 next slide, please.

7 BY MR. ROCHE:

8 Q. Dr. Edman, what does the data about the cryptographic
9 signature that you extracted show us about Plaintiffs' Exhibit
10 799, the draft email?

11 A. It shows the cryptographic signature was created
12 February 27th, 2014 in Eastern Time, which would be
13 February 28th in UTC+11.

14 Q. And about how long before the signature in 823 was this
15 signature created?

16 A. It was a little less than an hour.

17 Q. So the signature of the draft was created a little less
18 than an hour from the signature found in Plaintiffs' Exhibit
19 823?

20 A. Correct.

21 MR. ROCHE: Dorian, if we could go to the next slide,
22 please.

23 BY MR. ROCHE:

24 Q. All right. I think we've got on the screen Plaintiffs'
25 Exhibit 824 and Plaintiffs' Exhibit 799, the draft. I see

1 there's -- are there any differences between the draft and the
2 Plaintiffs' Exhibit 824?

3 A. Yes. Plaintiffs' Exhibit 824 appears to be an email sent
4 from craig@rcjbr.org to craig@rcjbr.org. And the text -- in
5 addition to including the cryptographic signature, the text is
6 also slightly different.

7 Q. Is that what the red boxes indicate?

8 A. Yes.

9 Q. And so I see the box on the left says: "You have one
10 million Bitcoin now in the trust. Start doing something for
11 yourself and this family you have."

12 Dr. Edman, was that line added shortly after the draft was
13 initially created in 799?

14 A. It appears so, yes.

15 Q. Dr. Edman, did Dr. Wright send forgery number one to anyone
16 besides himself?

17 A. Yes.

18 MR. ROCHE: Dorian, if we could go to the next slide
19 please, Plaintiffs' Exhibit 630, which was previously admitted
20 into evidence.

21 BY MR. ROCHE:

22 Q. Dr. Edman, what does Plaintiffs' Exhibit 630 show?

23 A. 630 shows a message that was forwarded from
24 craig.wright@hotwirepe.com to Ira Kleiman.

25 Q. Are the contents of this message to Ira Kleiman on

1 February 28th, 2014 the same as the contents in forgery one?

2 A. Yes, and they include identical cryptographic signatures.

3 MR. RIVERO: Objection, Judge. There were references
4 to two cryptographic signatures. I'm not sure -- this is
5 unclear testimony.

6 THE COURT: All right.

7 MR. ROCHE: We'll clarify the relationship.

8 BY MR. ROCHE:

9 Q. So what's the relationship between the cryptographic
10 signature we see in 630 and the cryptographic signature we
11 reviewed in 823?

12 A. They are the same.

13 Q. Dr. Edman, do you understand from the testimony you saw
14 from Dr. Wright that the first time he reaches out to the
15 family of David Kleiman was a couple weeks before this email
16 was sent to Ira?

17 A. That is my understanding.

18 MR. ROCHE: Dorian, could we go to the next slide,
19 please.

20 BY MR. ROCHE:

21 Q. So on the left --

22 MR. ROCHE: Let's keep this one on.

23 BY MR. ROCHE:

24 Q. So on the left we have the copy of forgery one that was
25 sent to Ira and on the right we have the draft that Craig

1 Wright sends to himself.

2 What time was forgery number one sent to Ira?

3 A. At 5:56 a.m., which I believe is in UTC.

4 Q. And how does that timestamp compare to the timestamp you
5 found in the cryptographic signature on the right?

6 A. They are within an hour of each other. I think even within
7 10 minutes.

8 Q. All right. And you have a few things highlighted in these
9 two slides. What does that show?

10 A. That shows differences between 824 and what was sent to Ira
11 Kleiman in 630.

12 Q. And can you describe the nature of those edits.

13 MR. RIVERO: Objection. The document speaks for
14 itself, Judge.

15 THE COURT: Overruled. I'll allow it.

16 THE WITNESS: It appears that a word was added and a
17 typo was fixed.

18 BY MR. ROCHE:

19 Q. So a few typos were fixed just a few minutes before the
20 email craig@rcjbr.org forwards this to Ira?

21 A. Correct.

22 Q. Have you reviewed any evidence in this case that suggests
23 forgery number one was created by anybody besides Craig Wright?

24 MR. RIVERO: Objection. Calls for speculation, Judge.

25 THE COURT: Based on the testimony, overruled.

1 THE WITNESS: I have not.

2 BY MR. ROCHE:

3 Q. For all the forgeries we're going to examine today and
4 tomorrow morning, have you seen any evidence that any of those
5 forgeries were created by anyone but Craig Wright?

6 MR. RIVERO: Same objection, Your Honor.

7 THE COURT: It's noted. Overruled.

8 THE WITNESS: I have not.

9 MR. ROCHE: Your Honor, we can stop here or we could
10 go like 10, 15 more minutes.

11 THE COURT: No. Why don't we go ahead and stop at
12 this time.

13 All right. Ladies and Gentlemen, we are going to
14 adjourn for the evening. Tomorrow's schedule will be the same.
15 Please make your way into the building, be here ready to come
16 into the courtroom at 9:45.

17 Have a pleasant evening.

18 As I stated previously, you're not to discuss this
19 case with anyone or permit anyone to speak with you. You're
20 not to conduct any independent research. Everything learned
21 about the case is learned within the courtroom.

22 If you'll place your juror notebooks in the jury room.
23 They will remain secure.

24 Have a pleasant evening.

25 (Jury not present, 5:02 p.m.)

1 THE COURT: All right. Thank you, Dr. Edman. We'll
2 see you tomorrow morning.

3 Is there anything further on behalf of the Plaintiff?

4 MR. FREEDMAN: Your Honor, there's two things for the
5 Plaintiffs.

6 THE COURT: All right. Go ahead and have a seat,
7 then.

8 MR. FREEDMAN: One, the Plaintiffs filed a request for
9 judicial notice last night, Your Honor, about receiving
10 judicial notice on the equivalence or the exchange rates
11 between Great British pounds and U.S. dollars and Australian
12 dollars and U.S. dollars. We don't need a ruling now. I just
13 wanted to flag that for the Court.

14 THE COURT: Did you comply with local Rule 7.183 and
15 confer with the Defendant?

16 MR. FREEDMAN: Your Honor, I believe it's a noticed
17 request for a judicial notice, but if the Court wants --

18 THE COURT: It would be helpful to the Court to know
19 that one of the prongs is that both sides are in agreement.

20 MR. FREEDMAN: We will confer with the other side,
21 Your Honor.

22 THE COURT: All right. Then we'll take it up once
23 you've set forth a notification, and then at least the Court
24 can have some preparation before we have any argument.

25 MR. FREEDMAN: Sure.

1 THE COURT: All right. And the second item?

2 MR. FREEDMAN: The second item, Your Honor, is -- I'd
3 like some time to discuss with my team, but if the Court
4 recalls, before the trial started we flagged that Dr. Wright
5 will claim that he is going to give his fortune to charity and
6 that it was inappropriate. He has now injected that into the
7 case in response to a question, which was: "Are you a
8 multi-billionaire?" So I don't know yet exactly what we want
9 to do, but I notified the Court at the time that we objected to
10 the response and I'd just like the Court to just give us a day
11 to confer internally and advise the Court what, if anything, we
12 think is appropriate.

13 THE COURT: All right. You've preserved the
14 objection. If there's any further action that you would like,
15 then you can address it at the appropriate name.

16 MR. FREEDMAN: Thank you, Your Honor. That's all for
17 Plaintiffs.

18 THE COURT: On behalf of the Defendant?

19 MR. RIVERO: Nothing from us, Judge.

20 THE COURT: All right, then. As I stated, you can use
21 the conference room. We are going to need the courtroom
22 tomorrow morning. But I'll plan on seeing you about 9:45 so we
23 can start right at 10:00.

24 Okay. Have a pleasant evening.

25 MR. RIVERO: Have a good evening, Judge.

(Proceedings adjourned at 5:04 p.m.)

1 UNITED STATES OF AMERICA)

2 ss:

3 SOUTHERN DISTRICT OF FLORIDA)

4 C E R T I F I C A T E

5 I, Yvette Hernandez, Certified Shorthand Reporter in
6 and for the United States District Court for the Southern
7 District of Florida, do hereby certify that I was present at
8 and reported in machine shorthand the proceedings had the 15th
9 day of November, 2021, in the above-mentioned court; and that
10 the foregoing transcript is a true, correct, and complete
11 transcript of my stenographic notes.

12 I further certify that this transcript contains pages
13 1 - 224.

14 IN WITNESS WHEREOF, I have hereunto set my hand at
15 Miami, Florida this 21st day of November, 2021.

16
17 /s/Yvette Hernandez
18 Yvette Hernandez, CSR, RPR, CLR, CRR, RMR
19 400 North Miami Avenue, 10-2
20 Miami, Florida 33128
21 (305) 523-5698
22 yvette_hernandez@flsd.uscourts.gov
23
24
25

<p>USCA11 Case: 22-11150 Document: 53-1 Date Filed: 11/30/22 Page 202 of 264</p> <p>COURTROOM DEPUTY: [2] 4/6 202/15 MR. BRENNER: [2] 4/12 4/20 MR. FERNANDEZ: [1] 5/5 MR. FREEDMAN: [383] MR. KASS: [1] 5/2 MR. LAGOS: [1] 4/16 MR. MESTRE: [1] 5/4 MR. RIVERO: [11] 4/25 211/2 211/16 211/22 216/2 218/3 219/13 219/24 220/6 222/19 222/25 MR. ROCHE: [24] 4/14 202/9 203/1 209/11 209/16 209/24 210/13 210/21 210/25 211/6 211/14 211/25 212/25 213/22 214/25 215/16 215/25 216/5 216/21 217/18 218/7 218/18 218/22 220/9 MR. ZACK: [1] 4/18 MS. MCGOVERN: [164] 4/23 5/7 7/5 7/12 9/16 9/21 10/17 15/4 17/16 22/10 22/16 27/24 29/20 29/22 31/16 34/13 34/15 38/9 39/13 42/5 44/16</p>	<p>44/20 50/22 61/22 63/15 63/18 65/15 66/12 69/22 71/9 74/12 76/8 78/19 81/4 81/18 87/1 91/20 93/19 94/4 96/23 98/16 103/8 103/20 103/22 107/13 111/23 112/10 113/11 113/14 115/15 115/20 116/10 116/13 116/16 118/16 119/20 120/10 121/1 121/22 122/2 122/23 123/1 123/15 124/16 125/12 126/10 126/16 126/18 127/14 128/5 128/16 129/3 129/17 130/7 131/4 132/11 132/23 133/11 133/18 134/14 135/8 136/9 137/11 137/19 138/7 138/18 139/22 139/25 140/15 141/2 141/21 142/10 142/25 143/9 143/24 144/11 145/12 146/11 147/2 147/19 148/12 148/22 149/14 150/5 151/1 151/14 152/20 153/14 154/1 154/17 156/9 157/3 157/22 158/1 158/3 158/7 158/14 159/11 161/7 161/24 163/5 164/5</p>	<p>164/17 165/13 165/17 166/8 167/8 168/1 168/17 168/21 168/24 169/16 169/21 170/3 170/6 170/14 170/21 171/11 172/20 174/4 177/19 181/21 183/12 184/8 184/23 186/10 187/1 188/19 190/8 191/10 192/5 192/12 192/19 192/24 193/3 196/10 197/17 197/22 198/17 198/19 200/12 200/25 201/16 201/21 THE COURT REPORTER: [1] 44/18 THE COURT: [244] THE WITNESS: [39] 9/25 34/18 38/12 60/22 61/4 63/9 78/21 81/7 92/12 113/16 116/20 121/21 122/4 126/21 126/23 136/11 144/15 146/14 149/1 149/3 150/8 150/12 161/15 161/23 162/2 184/10 186/13 189/25 191/12 196/13 197/25 198/21 202/8 202/22 210/23 213/21 219/16 220/1 220/8</p>
---	--	---

\$	198/4	10-2 [2] 1/24
\$1.5 [2] 66/14	\$53.7 billion [1]	10.5 [1] 8/14
67/21	197/21	10.5 million [1]
\$1.5 million [2]	\$60 [2] 26/6 27/6	8/10
66/14 67/21	'	100 [3] 1/17 84/21
\$1.9 [1] 113/17	' 13 [2] 25/19 56/7	84/23
\$1.9 billion [1]	' 14 [3] 25/19	1000 [1] 1/22
113/17	25/21 56/8	103 [1] 2/17
\$10 [3] 21/1 21/5	' 15 [1] 25/21	104 [1] 2/17
48/15	' 80s [1] 56/2	105 [1] 179/2
\$10.5 [1] 8/4	' cords' [1] 135/21	107 [2] 2/17 2/17
\$10.5 million [1]	' cores.' [1]	10:00 [1] 222/23
8/4	135/22	10th [1] 160/2
\$11 [8] 8/6 8/8	' Craig [1] 95/10	11 [6] 21/5 58/20
8/12 21/2 21/9	/	212/14 212/18
21/11 21/14 21/17	/s/Yvette [1]	212/20 216/13
\$12 [10] 27/8	224/17	11-page [1] 135/21
49/17 76/20 76/22	0	113 [2] 2/10 42/7
77/2 79/19 79/21	055 [2] 3/9 145/14	119 [2] 2/18 2/18
80/23 82/5 134/5	059 [2] 2/21	11:22 [1] 60/5
\$15 [2] 66/11	126/12	11:23 [1] 60/14
76/24	1	11:43 [2] 60/14
\$150 [3] 17/9	1,957,000,000 [1]	61/6
17/12 84/25	114/6	11th [7] 11/15
\$150,000 [1] 23/25	1.1 [1] 95/14	11/24 18/14 18/16
\$2 [3] 62/8 62/12	1.4 [1] 94/22	20/5 22/22 23/5
197/5	1.4A [1] 92/9	12 [6] 24/5 24/7
\$2,614,000,000 [1]	1.5 million [2]	55/6 73/9 80/1
114/21	67/24 68/24	199/19
\$200,000 [1] 15/25	1.7 [2] 95/24 96/2	12.9 million [2]
\$252 [3] 115/9	1.9 billion [1]	25/20 25/22
116/8 118/15	113/9	120 [2] 2/18 2/18
\$3.5 [1] 69/1	10 [15] 1/11 19/19	122 [1] 2/19
\$3.5 million [1]	21/6 21/15 21/17	123 [3] 2/19 2/19
69/1	49/10 49/23 84/19	2/19
\$300,000 [1] 15/17	113/22 135/21	124 [2] 2/20 2/20
\$34 [1] 19/16	156/12 181/7	125 [2] 2/20 2/20
\$378,475,713 [1]	209/21 219/7	126 [2] 2/21 2/21
57/8	220/10	127 [2] 2/21 2/21
\$38.4 [1] 25/15	10,642,000 [1]	128 [4] 2/22 2/22
\$38.4 million [1]	23/16	2/22 2/22
25/15		129 [2] 2/23 2/23
\$53.7 [2] 197/21		13 [3] 38/23

1	194/16 194/17	1:01 [1] 111/6
USCA11 Case: 22-11150 Document: 5311 Date Filed: 11/30/2022 Page: 204 of 254	195/15 199/22	1:02 [1] 112/4
13... [2] 105/17	220/10	2
212/14		
130 [2] 2/23 2/23	150 [1] 3/11	20 [4] 110/15
131 [2] 2/24 2/24	150,000 [1] 24/1	111/10 199/18
132 [4] 3/2 3/2	151 [1] 3/11	199/22
3/3 3/3	15th [1] 224/8	20-minute [4] 60/4
133 [2] 3/3 3/3	16 [6] 54/21 56/11	60/13 162/18
134 [4] 2/21 3/4	105/17 119/9 122/1	162/20
3/4 127/16	195/12	200 [4] 1/14 83/24
135 [4] 3/4 3/4	16,000 [1] 194/17	108/6 108/23
3/9 147/6	162 [2] 3/12 3/12	2001 [2] 172/9
137 [4] 2/9 3/5	162.5 [1] 69/2	172/11
3/5 15/9	164 [4] 3/12 3/12	2003 [1] 172/10
138 [4] 3/5 3/5	3/13 3/13	2004 [2] 186/13
3/6 3/6	166 [4] 2/10 3/13	186/15
139 [1] 3/6	3/13 44/23	2006 [1] 186/16
13th [1] 185/8	167 [1] 3/14	2007 [1] 59/2
14 [6] 35/15 35/19	168 [1] 3/14	2008 [2] 176/22
37/8 38/19 73/9	169 [2] 3/14 3/14	186/17
212/13	16th [3] 28/4 32/7	2009 [20] 9/4 9/4
140 [7] 2/22 3/6	32/15	10/24 12/8 14/10
3/7 3/7 3/7 43/25	17 [1] 52/20	16/22 41/11 43/4
128/7	171 [2] 3/15 3/15	58/7 59/8 59/9
141 [3] 3/7 3/8	174 [2] 3/15 3/15	59/21 117/25
3/8	175 [1] 179/21	138/25 175/18
142 [4] 2/22 3/8	177 [2] 3/16 3/16	176/9 179/16
3/8 128/18	18 [8] 40/8 48/18	181/25 186/17
145 [2] 3/9 3/9	53/12 110/14	197/2
145,000 [1] 85/7	110/14 120/19	2010 [7] 48/6 58/7
146 [3] 3/9 3/16	121/4 179/4	118/4 174/25
177/21	18-80176 [1] 4/6	179/19 180/15
147 [3] 3/9 3/10	18-month [1]	186/17
3/10	110/12	2011 [7] 12/11
148 [2] 3/10 3/10	181 [2] 2/11 50/25	12/11 58/7 174/18
149 [2] 3/11 3/11	184 [2] 3/16 3/16	186/18 187/13
14th [2] 12/22	187 [2] 3/14 168/3	196/13
52/7	18th [6] 17/25	2012 [19] 12/13
15 [17] 1/5 2/9	58/19 73/8 73/20	58/7 160/2 174/18
2/9 25/20 73/21	105/16 105/20	174/20 179/9
93/15 96/25 193/16	19 [2] 73/21	179/11 183/6
194/9 194/11	108/17	183/10 184/5 185/6
194/13 194/16	190 [2] 3/17 3/17	185/15 186/1 186/2
	191 [2] 2/11 62/1	

2	73/8 73/20 105/16	2525 [1] 1/22
USCA11 Case: 22-11150 Document: 53-11 Date Filed: 11/30/22 Page: 205 of 264	105/20 187/19	256 [2] 2/14 76/10
2012... [5] 186/3	187/20 187/22	257 [2] 2/15 81/21
186/5 186/6 186/18	2021 [4] 1/5 116/5	25th [2] 6/25
209/21	224/9 224/15	20/11
2013 [12] 6/22	203 [1] 2/7	26 [2] 58/20
6/23 6/25 7/1 9/4	206 [1] 114/5	212/16
12/7 12/14 50/4	209 [3] 2/23	26th [2] 6/22
58/7 79/24 83/17	109/10 129/5	212/13
186/19	20th [4] 7/3 7/20	27 [1] 2/9
2014 [43] 7/3 7/20	9/12 9/15	271 [1] 182/20
9/12 9/15 10/15	210 [2] 2/23	274 [2] 3/5 138/9
10/21 11/15 11/24	130/10	276,268,599 [1]
12/22 17/25 18/14	211 [8] 2/24 3/17	49/9
18/16 20/5 20/11	3/17 3/18 3/18	27th [2] 94/15
22/22 23/5 28/4	3/18 3/18 131/22	216/12
32/8 32/15 39/20	213 [2] 3/2 132/14	28 [2] 2/9 123/10
41/20 48/2 50/4	214 [2] 3/3 132/25	2800 [1] 1/17
50/9 51/17 52/7	215 [2] 3/3 133/13	28th [6] 76/4
58/7 58/25 59/23	216 [4] 2/13 3/19	81/23 214/9 214/11
79/24 83/12 83/14	3/19 69/25	216/13 218/1
84/3 179/12 184/7	217 [2] 2/12 63/21	296 [2] 2/16 94/10
185/13 186/5 186/6	219 [2] 3/4 134/16	2:00 [2] 111/5
212/13 214/9	21st [2] 185/12	112/3
214/11 216/12	224/15	2:03 [1] 112/4
218/1	22 [2] 105/21	2:04 [1] 112/14
2015 [21] 57/24	212/16	2nd [1] 1/17
58/6 58/7 58/14	223 [2] 3/4 135/10	
58/23 59/7 64/17	224 [5] 1/8 2/2	3
73/2 73/12 73/24	3/5 137/13 224/13	3,000 [2] 56/24
74/16 76/4 81/23	229 [2] 2/12 65/19	56/24
85/15 87/9 91/2	23 [1] 179/4	3,208 [2] 108/10
91/13 94/16 98/5	230 [2] 2/18	108/14
99/9 135/20	119/23	3,500,000 [1]
2016 [3] 108/6	233,000 [1] 156/11	68/16
113/8 139/10	23rd [2] 40/21	3.2 [2] 72/1 72/5
2017 [5] 14/5 14/9	183/10	3.5 million [1]
14/10 113/8 114/5	24 [4] 55/6 57/2	68/20
2018 [6] 56/6	70/20 71/20	30 [6] 24/1 77/21
114/19 114/23	241 [2] 2/14 74/14	77/22 88/20 146/5
114/25 115/4	248 [2] 2/15 87/3	146/10
201/10	24th [2] 48/2 87/9	30,000 [1] 77/21
2019 [1] 179/3	25 [3] 25/24 25/25	300 [4] 18/21 19/6
2020 [8] 58/19	108/20	49/18 83/24

3	192/13 198/17	85/5
USCA11 Case: 22-11150 Document: 53-11 Date Filed: 11/30/22 Page: 206 of 254	201/16	5500 [1] 1/14
300,000 [1] 58/22	42 [3] 2/10 2/10	56 [1] 49/4
300-plus [1] 18/24	40/20	560 [1] 203/13
301 [2] 2/16 99/5	44 [4] 2/10 2/10	5698 [1] 224/19
303,895,458 [1]	28/19 29/24	578 [2] 3/7 140/17
49/11	46 [3] 52/24 56/10	58 [1] 105/15
305 [1] 224/19	58/19	598 [2] 3/7 141/4
308 [2] 2/18	47 [1] 46/4	5:02 [1] 220/25
120/13	49 [2] 23/21	5:04 [1] 223/1
30th [2] 6/23	182/19	5:56 [1] 219/3
116/5	49.5 [6] 23/16	5th [1] 99/8
310 [3] 2/19 123/2	23/18 23/20 24/9	
123/3	24/15 82/14	6
313 [2] 3/6 138/20	4th [1] 179/3	6,080,555 [2] 48/4
315 [2] 2/19		51/7
123/19	5	6.4 million [1]
32 [2] 53/15 56/10	5,000 [1] 91/18	108/12
326 [3] 3/6 140/3	5.1 [1] 93/18	60 [2] 13/11
140/4	50 [3] 2/11 2/11	153/23
33128 [2] 1/25	56/21	60-page [1] 13/14
224/18	50,000 [4] 59/10	61 [1] 2/11
33131 [2] 1/14	59/22 176/9 197/3	62 [4] 2/11 5/15
1/18	50-something [1]	73/9 73/21
33134 [1] 1/22	55/13	63 [2] 2/12 2/12
337 [2] 2/20	50A [1] 73/7	630 [9] 3/11 151/3
124/20	50B [1] 73/19	158/18 159/7
34 [1] 19/20	51 [3] 46/14	217/19 217/22
35 [1] 214/7	105/17 105/21	217/23 218/10
350 [2] 2/13 71/12	514 [2] 3/10	219/11
37 [3] 68/8 68/12	147/21	65 [2] 2/12 2/12
68/24	52 [1] 105/22	664 [2] 3/8 141/23
382 [1] 179/4	523-5698 [1]	685 [2] 2/17
398 [3] 2/20	224/19	107/16
125/15 125/16	53 [2] 46/22	69 [3] 2/13 2/13
3:08 [2] 162/22	105/19	179/22
162/23	538 [2] 3/10	695 [2] 3/8 142/12
3:30 [2] 162/23	148/14	6th [2] 10/15
163/8	540 [2] 3/11	10/21
4	149/17	7
400 [2] 1/24	546 [4] 3/12	7.183 [1] 221/14
224/18	163/14 163/20	71 [2] 2/13 2/13
403 [6] 81/18	164/7	720 [2] 3/13
126/18 192/5	55 [3] 78/25 79/1	

7	853.2 [3] 3/14	13/21 14/18 14/25
USCA11 Case: 22-11150 Document: 53-11 Date Filed: 11/30/22 Page: 207 of 254	169/18 172/22	152/12 16/6 16/11
720... [1] 164/19	853.3 [2] 3/15	16/14 16/17 16/19
727 [2] 2/9 28/1	174/6	17/9 18/1 18/7
74 [2] 2/14 2/14	853.4 [1] 3/17	18/21 19/22 22/8
76 [2] 2/14 2/14	856 [3] 3/15 167/9	24/12 24/17 25/11
781 [2] 2/17 104/1	171/13	27/20 34/3 34/10
799 [10] 3/12	86 [1] 2/15	35/11 36/11 39/19
159/11 162/8	862 [1] 31/24	42/24 43/8 44/3
162/13 162/14	869 [2] 3/16	44/8 44/9 45/10
215/1 215/21	184/25	47/4 48/10 48/17
216/10 216/25	87 [1] 2/15	53/9 55/2 55/3
217/13	8th [1] 74/16	56/6 56/20 57/24
799.1 [5] 3/19	9	58/3 59/16 59/17
215/18 215/20		61/15 61/16 63/4
215/25 216/4	90 [1] 74/21	65/9 69/11 73/3
8	94 [2] 2/16 2/16	73/5 73/16 74/1
80176 [1] 4/6	98 [5] 2/16 199/3	74/8 75/23 77/23
81 [2] 2/15 2/15	199/5 199/11 200/8	79/21 81/13 83/5
821,050 [1] 197/20	99 [2] 2/16 93/4	85/2 93/9 95/16
823 [13] 209/12	9:18-cv-80176-BB	99/24 103/2 106/12
209/16 209/19	[1] 1/2	110/8 110/8 110/13
210/8 210/11	9:45 [2] 220/16	111/2 111/9 111/10
210/20 210/24	222/22	117/2 117/20
211/13 214/1 215/6	9:58 [2] 1/6 4/1	117/21 117/21
216/14 216/19	9:59 [1] 6/2	126/8 126/24
218/11	A	128/23 128/24
823.1 [3] 3/17	a.m [8] 1/6 4/1	130/22 130/25
211/1 211/4	6/2 60/5 60/14	131/13 132/3
823.2 [7] 3/18	60/14 61/6 219/3	134/24 134/25
210/14 210/22	Abacus [2] 184/16	136/3 137/8 138/13
211/1 211/4 212/3	185/11	142/3 147/16 153/9
212/10	abeyance [2] 91/8	156/12 162/10
823.3 [9] 3/18	91/8	164/2 172/6 172/7
210/14 211/8	ability [2] 49/20	172/9 172/10
211/10 211/11	55/4	173/18 176/8
211/12 211/15	able [12] 43/20	176/10 176/11
211/24 214/1	51/18 57/10 88/4	178/3 179/20 180/1
824 [6] 3/13	92/25 100/12 122/3	189/21 191/7 191/7
166/10 216/25	133/16 157/8 200/5	191/22 191/24
217/2 217/3 219/10	200/5 205/25	194/22 194/23
825,050 [1] 195/18	about [131] 11/19	196/18 197/21
853 [3] 169/2	12/2 12/3 13/19	199/5 200/3 208/2
170/9 171/24		208/4 212/15

A		
<p>USCA11 Case: 22-11150 Document: 58-11 Date Filed: 11/30/2022 Page: 208 of 254</p> <p>about... [10] 212/19 214/1 214/18 215/10 216/8 216/9 216/14 220/21 221/9 222/22 above [5] 48/14 96/3 124/7 185/16 224/9 above-mentioned [1] 224/9 above-referenced [1] 185/16 absence [1] 122/24 absolutely [4] 64/21 77/19 101/5 170/22 abstract [1] 91/7 academic [1] 13/14 academics [2] 13/8 13/11 accept [1] 127/9 accepted [4] 8/8 64/9 77/12 136/6 access [8] 34/20 37/2 146/10 146/21 167/15 171/3 195/17 214/20 accordance [1] 101/4 accordingly [1] 200/14 account [19] 12/24 12/25 14/3 14/3 29/3 104/20 116/4 144/16 155/9 155/10 155/18 160/9 169/7 171/2 171/7 171/8 172/5 173/14 184/19 accountant [5] 11/19 14/17 15/15</p>	<p>33/15 33/17 accountants [5] 16/24 32/24 48/21 50/10 197/8 accounting [6] 12/12 37/18 45/18 45/20 52/18 90/13 accounts [3] 29/7 84/1 195/17 accrual [1] 45/22 accruals [1] 25/24 accurate [1] 135/18 accurately [1] 40/16 achieve [4] 80/12 93/4 93/7 100/12 achieved [1] 95/5 achieving [1] 80/16 acknowledgment [1] 9/19 acquire [3] 82/8 82/13 82/21 acquired [1] 40/24 Acquisition [1] 113/4 across [3] 91/19 92/25 124/10 action [3] 30/21 74/17 222/14 actions [2] 31/6 33/20 active [1] 178/24 activities [2] 52/25 53/17 activity [2] 185/9 206/15 actual [6] 8/17 40/15 127/10 144/18 167/13 170/25 actually [109] 7/21 7/22 8/5 8/7</p>	<p>8/18 12/10 13/20 15/13 15/20 15/21 15/21 18/8 18/8 18/20 19/13 19/15 21/8 21/11 25/18 26/16 26/18 29/14 32/11 34/4 35/25 42/13 42/25 45/17 47/5 48/9 48/14 50/11 51/11 51/19 53/3 55/20 55/23 56/1 56/13 59/8 59/12 59/18 62/11 65/12 66/3 68/14 80/8 81/1 81/1 81/3 82/12 88/12 88/15 89/15 89/22 89/22 89/23 90/12 90/15 90/18 94/17 100/3 102/1 103/5 108/8 109/1 109/7 113/1 113/3 113/5 115/11 116/25 121/8 123/13 124/8 134/3 143/18 147/9 147/24 148/2 148/3 154/10 160/7 162/17 163/12 165/20 167/3 168/15 175/16 177/4 178/16 179/1 179/9 180/5 180/8 180/10 180/21 182/5 184/5 186/4 186/13 190/1 197/10 198/23 199/20 205/19 205/22 209/12 214/4 add [2] 56/11 172/1 added [5] 56/13 82/11 171/25 217/12 219/16</p>

A	administrators [3]	217/19
USCA11 Case: 22-11150 Document: 53-14 Date Filed: 11/30/22 Page: 109 of 254	44/11 44/12 84/21	admonish [1] 68/20
addition [2]	admissibility [3]	adoptive [1]
207/25 217/5	156/24 157/19	143/22
additional [1]	162/9	Adrian [1] 104/6
98/24	admission [3] 5/16	advance [3] 82/7
address [41] 5/13	143/22 156/16	82/8 82/12
28/13 29/15 99/17	admit [7] 14/11	advice [1] 37/5
112/6 126/5 131/9	111/12 143/10	advise [3] 135/17
143/18 144/19	157/4 188/23	135/19 222/11
145/9 153/3 153/5	210/25 215/25	advised [2] 5/17
154/5 154/6 154/14	admits [1] 15/1	30/15
154/20 156/7	admitted [77] 2/8	advising [1] 9/13
156/21 156/22	3/2 12/13 15/7	Africa [1] 199/13
157/2 157/17	27/25 42/6 44/22	after [23] 11/18
157/18 157/24	50/24 60/9 61/25	18/1 18/2 25/21
159/4 159/4 160/12	63/19 65/18 69/24	27/10 32/10 32/15
160/13 160/23	71/11 74/13 76/9	33/23 36/21 39/23
160/25 161/11	81/19 87/2 94/8	64/17 73/24 76/14
161/13 162/2 162/7	98/20 99/4 103/24	83/6 83/23 110/14
162/8 163/1 167/9	107/15 120/12	110/19 184/2
167/23 171/2 171/3	123/2 123/18	194/19 195/12
172/5 222/15	124/19 125/15	199/19 204/12
addressed [4]	126/11 127/15	217/12
28/24 30/5 115/18	128/6 128/17 129/4	afternoon [4]
193/1	130/9 131/21	112/21 112/22
addresses [1]	132/13 132/24	202/11 203/5
193/16	133/12 134/15	afterwards [1]
addressing [2]	135/9 137/12 138/8	108/25
97/19 171/21	138/19 140/3	again [46] 12/3
adequate [1] 94/7	140/16 141/3	12/4 12/5 20/19
adjourn [1] 220/14	141/22 142/11	21/11 21/25 22/3
adjourned [1]	145/13 147/5	23/22 38/12 40/1
223/1	147/20 148/13	45/15 53/2 53/13
administration [7]	149/16 151/2	53/20 54/8 56/16
83/12 84/4 84/6	162/13 164/6	60/20 64/22 67/18
84/14 85/13 87/19	164/18 166/9 168/2	68/2 69/2 74/1
87/20	169/17 171/12	75/23 78/6 78/16
administrative [1]	171/24 172/21	78/21 80/9 92/23
146/19	174/5 177/20	93/11 93/11 93/13
administrator [5]	184/24 187/4 187/5	99/8 104/21 109/11
146/18 146/18	187/6 190/9 192/18	114/11 120/3 121/5
146/20 188/9	211/3 211/23 215/1	123/13 131/6
188/10	215/18 216/3	134/21 139/11

A	album [1] 175/2	133/22 136/12
USCA11 Case: 22-11150 Document 33-1 Date Filed: 11/30/22 Page 210 of 254	algorithms [2]	138/15 140/22
again... [5]	54/22 54/24	143/17 145/3
183/14 189/16	alive [4] 25/22	146/18 146/21
190/13 191/8	134/8 140/12 148/3	148/4 149/2 149/25
193/15	all [183] 5/10	151/23 154/9
against [10] 6/25	5/12 5/12 5/18	155/21 156/13
30/24 31/7 33/21	5/22 5/23 5/25 7/8	157/13 158/14
34/3 34/11 84/13	7/13 10/13 16/6	159/13 162/24
88/4 117/13 200/5	17/1 18/21 19/17	163/1 163/6 163/9
agencies [1]	19/19 20/3 20/23	165/1 165/4 165/6
204/17	27/25 33/22 34/21	165/6 167/16 169/5
ago [1] 15/11	35/3 35/11 35/22	169/17 170/8
agree [10] 34/24	37/4 38/17 40/16	170/11 171/15
72/5 72/18 84/10	45/8 45/19 47/6	172/14 173/9
111/11 156/17	47/7 48/9 53/9	174/10 175/18
156/20 158/17	53/10 54/16 56/9	175/19 175/22
194/11 201/2	58/1 58/3 58/12	175/22 175/23
agreed [5] 66/19	59/5 60/6 60/11	177/2 178/11
85/18 85/20 154/22	60/15 60/18 61/5	178/13 178/18
175/7	61/7 64/19 64/22	179/1 179/17
agreement [24]	67/12 67/22 67/23	180/16 181/22
64/21 66/4 67/5	67/25 68/12 68/24	184/19 188/1
67/5 67/7 67/7	71/16 72/4 75/8	189/18 190/9 195/8
67/8 67/16 67/18	78/2 78/8 78/17	195/11 196/22
67/19 67/19 68/2	78/25 79/5 81/25	197/1 199/3 200/11
68/2 68/5 68/17	83/1 85/9 89/7	201/20 201/23
68/20 73/25 83/6	89/10 89/13 90/9	202/4 202/10
84/11 87/8 91/7	91/9 93/12 95/3	202/11 211/3 216/3
123/6 124/23	98/23 99/4 99/25	216/24 218/6 219/8
221/19	100/2 100/17 101/5	220/3 220/13 221/1
agreements [5]	101/7 101/16	221/6 221/22 222/1
10/13 99/25 113/3	101/18 102/13	222/13 222/16
113/4 118/22	102/14 102/15	222/20
ahead [10] 4/4	104/15 106/7	alleged [2] 166/25
5/25 60/6 72/21	106/20 108/11	174/22
112/8 112/12	108/19 110/3 110/7	allegedly [2]
162/20 202/21	110/7 110/18 111/4	185/6 185/14
220/11 221/6	111/7 111/11	allow [7] 78/20
A1 [4] 43/23 47/9	111/20 112/5	81/5 84/6 109/19
98/1 101/14	112/12 112/15	183/17 197/8
Alan [5] 106/4	117/13 121/14	219/15
106/6 106/19 107/9	126/24 127/20	allowed [5] 38/1
137/17	130/6 131/1 133/20	39/11 115/18 169/1

A	224/1	136/13
USCA11 Case: 22-11150 Document 53-1 Date Filed: 11/30/22 Page 216 of 254	American [2] 12/4	annual [1] 68/22
allowed... [1]	12/5	annum [1] 69/3
171/6	Amit [1] 5/8	anonymous [1]
allowing [1] 117/8	among [1] 205/11	204/10
almost [3] 91/18	amount [10] 25/21	another [16] 11/9
156/5 214/16	25/23 26/8 37/17	14/3 15/25 25/24
along [1] 179/25	43/15 75/13 84/7	25/25 82/25 82/25
alongside [1]	101/3 175/23 182/6	98/6 99/1 111/10
204/25	amounts [2] 48/22	123/6 161/9 166/14
already [15] 23/2	197/1	169/4 173/10
33/7 38/16 48/23	analysis [13]	183/20
58/25 78/2 78/6	94/15 94/17 113/21	answer [17] 11/1
78/17 92/13 149/20	204/9 206/15 207/4	13/18 20/10 28/6
157/17 186/14	207/8 207/14	32/18 37/15 37/24
199/1 208/23	208/10 208/24	80/22 85/13 108/13
209/16	208/25 211/12	121/11 150/11
also [27] 12/18	212/8	159/6 160/10
19/21 23/23 25/10	analyze [6] 180/6	188/17 191/12
36/22 70/3 70/4	180/24 206/19	211/20
71/4 88/14 100/8	207/12 214/2 214/5	answered [14]
102/24 116/17	analyzed [5]	22/11 22/17 38/10
137/6 146/11	207/15 208/1 209/8	78/19 85/12 118/17
166/22 166/23	209/9 213/25	136/9 148/23 150/5
166/24 166/25	analyzing [1]	153/15 184/8
178/9 180/12	215/21	186/11 196/11
182/23 193/23	ANDRES [2] 1/19	197/17
198/25 202/16	4/25	answering [2]
204/3 213/3 217/6	ANDREW [26] 1/16	30/13 191/6
altered [1] 38/15	4/12 10/5 15/16	answers [2] 33/11
although [2]	28/22 33/6 37/13	111/15
165/24 200/7	37/14 37/16 37/23	Anti [1] 188/16
always [7] 6/7	38/6 38/21 39/2	Anti-Avoidance [1]
24/21 36/2 40/19	39/9 40/12 44/9	188/16
58/8 166/1 173/23	127/24 128/11	anticipate [1]
am [8] 47/17 75/2	128/22 132/18	111/21
106/14 183/16	133/4 135/15	Antiguan [1] 196/1
189/25 195/5	167/21 177/13	Antonopoulos [2]
201/10 203/11	187/12 187/12	179/20 180/6
AMANDA [2] 1/20	angel [2] 41/12	any [65] 7/14 17/4
4/23	41/14	19/15 40/4 41/18
Amazon [1] 83/1	Angela [1] 63/10	50/12 62/19 62/20
America [5] 8/1	annoyed [1] 136/16	64/2 64/2 64/4
8/2 92/25 199/14	annoying [1]	64/11 76/17 79/3

A	212/18 221/3	33/20 35/6 41/13
USCA11 Case: 22-11150 Document: 53-11 Date Filed: 11/30/22 Page: 192 of 254	222/11	43/18 45/19 51/23
any... [51] 82/1	anywhere [1] 55/19	51/23 55/5 55/17
82/6 91/11 98/24	apart [2] 177/2	60/12 60/15 77/7
101/7 101/7 101/12	188/17	79/7 79/25 79/25
103/13 105/13	apologies [1]	80/12 80/14 80/14
111/21 113/17	162/15	88/4 92/25 95/9
118/1 135/17	appear [2] 156/23	95/18 96/9 97/11
142/21 144/18	206/22	98/23 100/25 101/1
148/17 148/19	appearances [2]	101/13 103/13
149/3 149/20	1/12 4/8	103/15 103/15
149/25 149/25	appears [11] 97/22	104/10 104/21
150/2 150/9 151/6	126/6 152/8 168/8	106/13 108/6
166/17 169/15	195/12 214/17	108/19 109/5 110/4
170/2 176/16	215/4 215/7 217/3	110/7 110/9 112/17
178/16 180/18	217/14 219/16	114/20 116/3 117/7
184/6 185/17 188/5	application [3]	117/8 117/17
190/7 192/14 198/7	19/10 105/7 105/11	126/14 135/17
201/20 201/24	applications [1]	135/18 136/6 144/2
202/2 205/13 206/6	105/4	155/10 157/6
208/25 209/4	appoint [2] 23/23	162/25 168/7 170/8
214/22 217/1	188/9	175/2 175/20 180/1
219/22 220/4 220/4	appointed [1]	187/13 188/7
220/20 221/24	44/11	189/23 190/15
222/14	appreciate [2] 6/7	191/7 191/12
anybody [1] 219/23	207/22	191/17 191/21
anymore [1] 58/2	approach [4]	193/16 194/11
anyone [17] 24/6	152/23 153/1	194/13 194/16
24/6 26/22 37/2	155/19 192/19	194/17 195/15
37/25 57/16 74/18	appropriate [3]	195/16 195/18
75/17 85/2 110/20	97/16 222/12	195/19 195/25
165/6 202/2 208/16	222/15	197/20 198/1 198/1
217/15 220/5	approximately [1]	198/15 198/25
220/19 220/19	198/5	199/16 200/8
anyone's [2]	April [8] 6/22	201/23 201/25
172/15 196/15	6/23 28/4 32/7	203/10 203/12
anything [24] 5/12	32/15 48/2 179/3	208/3 209/1 209/5
64/6 73/2 73/5	179/12	209/5 210/3 210/23
78/13 112/6 112/9	April/May of [1]	212/11 213/15
117/12 150/22	179/12	217/1 217/25
154/5 159/5 159/6	are [115] 5/8 5/11	218/12 219/6
160/17 163/1 165/3	5/12 10/9 11/20	220/13 221/19
165/7 177/7 182/4	17/14 19/6 19/6	222/7 222/21
192/25 197/1 197/1	30/15 31/1 31/6	areas [8] 19/8

A	59/23 59/25 62/6	157/18 157/18
USCA11 Case: 22-11150 Document: 53-1 Date Filed: 11/30/22 Page: 213 of 254	62/6 63/25 64/1	157/19 158/11
areas... [7] 55/16	66/2 67/9 68/22	161/25 162/3 162/9
92/25 109/11	69/12 71/5 72/5	163/13 163/24
109/14 109/19	72/22 74/20 76/13	164/11 165/2
134/25 180/14	77/7 77/7 79/2	165/12 165/22
argue [1] 156/14	79/19 82/5 82/20	166/1 166/14
argument [4] 59/18	82/20 86/19 88/9	167/12 167/13
117/23 161/10	88/13 89/5 89/7	167/20 169/7
221/24	89/8 90/11 91/4	169/25 170/16
Argumentative [1]	92/12 95/3 95/10	170/17 174/19
153/15	96/2 96/3 96/14	175/9 176/3 176/4
around [14] 11/25	97/10 97/25 98/17	177/23 182/1
41/7 41/9 56/21	99/12 100/3 101/6	184/10 185/13
62/17 73/24 83/10	101/11 101/21	188/15 194/6 194/9
83/17 98/5 110/23	106/5 107/9 108/6	194/19 195/20
113/7 115/9 116/8	108/17 108/23	196/13 196/18
149/10	108/24 113/9 113/9	196/19 196/20
arrange [1] 79/17	115/13 116/16	200/24 206/3 206/3
arranged [1] 26/4	116/22 117/7 117/9	206/10 206/13
arranging [2]	117/19 118/5	207/4 207/12
62/18 62/19	121/24 123/22	210/12 212/14
artifacts [1]	124/23 125/5 127/4	212/16 213/19
206/14	127/23 128/10	215/1 215/22 218/1
artificial [1]	128/21 129/8	220/18 222/20
55/15	129/12 129/14	Asia [1] 199/13
as [220] 1/3 6/7	130/13 130/15	ASIC [1] 175/20
8/13 8/13 10/23	130/17 132/6 132/6	aside [1] 214/21
13/3 13/24 14/12	132/17 133/3	ask [9] 5/19 7/8
14/16 15/18 16/1	133/18 133/22	7/14 78/16 121/5
16/21 20/7 22/6	133/25 134/4 134/9	131/6 201/24
27/9 27/12 27/19	134/23 136/11	201/24 204/20
29/10 31/2 33/11	137/4 137/16	asked [38] 10/12
33/11 34/7 34/18	138/12 139/9 140/7	15/11 22/10 22/16
37/16 38/13 39/6	140/21 141/14	23/9 30/19 31/24
39/6 39/6 40/14	142/2 142/7 142/17	38/9 44/11 63/11
41/25 43/4 43/18	143/22 144/14	63/12 78/19 117/11
45/8 45/20 47/6	145/7 145/22 146/5	118/16 121/9
48/10 48/14 49/13	147/14 148/7	121/25 136/9 142/6
51/9 51/22 53/3	149/20 150/8	148/22 149/23
53/17 53/20 53/22	150/17 151/9	150/5 153/14
53/22 54/5 54/10	151/21 152/13	156/14 170/12
54/11 56/17 56/20	153/5 153/6 153/20	170/24 176/18
57/10 59/1 59/23	156/3 156/23	176/18 183/17

A	associated [8]	attributes [1]
USCA11 Case: 22-11150 Document: 58-1 Date Filed: 11/30/2022 Page: 214 of 254 asked... [10]	30/24 52/25 97/9	208/7
184/8 185/23	171/6 195/19	audit [6] 16/1
186/10 190/14	205/24 206/3	17/1 20/7 26/20
195/21 196/10	212/20	34/8 186/17
197/17 202/4	assume [1] 87/25	audited [1] 22/24
206/19 206/20	assuming [1] 49/9	auditing [1] 15/14
asking [10] 5/16	Assumptions [1]	auditor [3] 29/5
10/16 13/16 16/19	46/24	45/20 59/3
18/18 22/5 22/8	asymmetric [1]	auditors [2] 17/1
34/11 98/12 183/18	34/25	42/17
asks [2] 189/20	ATO [8] 9/3 11/19	August [5] 41/11
191/2	15/4 15/11 28/13	75/18 75/22 76/4
aspect [1] 55/18	136/5 140/21	81/23
ass [2] 36/14	142/18	Australia [22] 8/2
36/18	attach [1] 25/10	12/4 19/17 30/21
assessing [1] 49/8	attached [10]	37/17 38/6 43/8
assessment [3]	10/13 19/6 30/25	59/4 77/3 82/18
46/2 46/7 52/14	45/6 107/2 107/21	100/18 127/24
asset [4] 66/11	119/5 143/13	148/3 153/21
66/14 67/21 199/15	143/17 151/12	156/13 172/11
assets [32] 25/13	attaches [1] 65/21	175/22 178/12
26/11 26/17 26/17	attaching [8] 28/7	178/18 186/1
26/21 35/24 54/6	32/22 123/24	212/21 212/23
67/24 71/6 75/13	133/23 137/17	Australian [73]
75/14 79/25 80/4	141/15 142/18	7/2 7/3 7/19 9/10
88/1 88/4 185/19	184/17	10/6 10/15 10/20
187/9 187/17	attachment [12]	12/1 13/9 14/16
187/19 187/21	20/10 30/3 46/1	16/6 16/19 18/6
187/24 188/2	46/3 46/5 86/8	18/14 18/17 21/8
188/14 194/21	87/10 137/23	24/11 24/16 25/23
194/25 195/2 195/2	143/11 143/13	27/9 28/6 28/23
195/2 195/21 196/9	144/2 185/8	29/14 30/2 32/16
197/16 200/7	attachments [2]	32/18 34/12 34/18
assign [2] 97/14	142/22 143/20	36/22 37/14 38/7
101/5	attempt [2] 152/25	39/23 40/2 40/11
assigned [2] 91/6	162/21	43/5 49/9 49/11
204/18	attempted [1]	51/13 51/15 51/16
assignment [4]	117/15	54/14 56/15 64/22
100/17 104/11	attempting [1]	67/22 70/5 70/6
120/3 120/16	192/16	75/12 82/6 88/3
assist [2] 30/13	attorney [1] 79/16	88/19 89/2 100/4
95/20	Attorney's [1]	101/2 101/3 101/4
	206/11	108/7 109/5 109/10

A	B	26/13 26/15 27/6
USCA11 Case: 22-11150 Document: 53-11 Date Filed: 11/30/22 Page: 215 of 254		195/6
Australian... [15]	BAA [1] 175/11	balanced [1] 8/19
109/14 109/24	bachelor [1]	bank [14] 14/2
110/2 134/19	203/25	14/3 44/1 44/3
135/15 137/6 141/7	back [74] 5/23 6/6	51/13 51/15 64/12
175/13 175/21	7/14 8/14 8/22	75/16 89/6 89/8
182/13 186/2	10/9 12/6 15/18	90/1 92/18 92/24
196/14 196/17	15/18 16/22 19/20	100/11
197/11 221/11	21/6 21/15 21/17	bankers [1] 43/10
authentic [5]	22/19 25/4 25/8	banking [26] 43/13
206/22 206/25	28/2 28/20 31/17	43/16 43/17 43/19
207/3 207/7 209/6	38/18 41/10 43/7	45/10 51/9 51/14
authenticity [3]	44/13 48/21 48/22	51/14 51/18 51/24
152/21 154/2	49/3 60/15 61/7	53/21 89/11 89/12
161/25	63/22 64/25 67/13	89/19 89/24 90/1
authorize [3]	75/2 77/3 83/23	90/2 90/3 90/5
164/24 165/3	85/21 87/4 90/17	90/6 90/9 90/14
165/11	93/9 94/1 109/13	90/22 90/22 101/21
authorized [1]	111/5 112/3 112/5	109/21
165/11	112/15 112/17	bankrupt [4] 12/10
available [3] 84/2	119/13 121/3	187/25 188/4
118/3 118/8	131/16 136/1 136/3	196/14
avenue [3] 1/24	136/5 136/11	bankruptcy [6]
188/5 224/18	136/23 136/24	84/17 84/18 187/10
average [2] 85/6	144/5 144/6 145/4	187/13 187/25
180/22	148/2 162/24 163/2	188/7
Avoidance [1]	163/6 163/9 167/17	bankrupted [1]
188/16	170/24 180/17	188/9
awaiting [1]	180/25 181/5 182/5	banks [1] 90/20
104/10	211/18 211/20	Baraka [4] 43/23
aware [4] 31/6	211/21 211/25	47/9 98/1 101/14
33/20 174/21	216/5	barrister [1]
174/24	background [1]	61/18
away [9] 6/23	203/24	base [3] 49/17
79/15 85/3 91/7	backpay [1] 85/20	49/18 57/8
176/8 176/13	bad [3] 21/15	based [10] 15/6
187/18 197/4 210/5	45/21 83/16	33/15 42/15 46/18
Ayre [11] 58/24	Baker [10] 91/14	53/21 54/22 114/4
59/23 61/19 62/17	91/15 91/17 92/4	115/18 204/19
63/3 63/23 65/23	94/13 94/24 104/6	219/25
129/23 131/15	113/8 113/21	basically [36]
132/4 133/23	114/19	11/9 23/25 25/1
Ayres [1] 62/5	balance [5] 25/11	37/3 38/14 39/7

B	97/13 97/14 97/20	13/18 13/18 15/21
USCA11 Case: 22-11150 Document: 38-1 Date Filed: 11/30/22 Page: 212 of 254	98/19 99/23 103/24	19/15 22/5 23/8
basically... [30]	104/11 109/11	24/2 24/20 29/1
41/9 43/10 53/4	110/1 110/25	30/5 38/16 39/7
53/8 58/9 62/10	112/16 113/9	42/18 43/14 44/1
68/22 76/23 80/5	114/21 115/19	45/9 45/13 47/11
80/7 84/10 84/19	117/20 122/3 123/2	51/19 54/16 55/10
85/1 90/10 95/5	126/6 127/5 127/9	55/25 58/2 59/2
100/10 109/18	130/9 131/21	60/8 62/19 64/9
117/5 117/15	133/16 136/2	75/14 77/2 78/10
131/15 136/22	150/20 150/22	79/6 79/8 80/12
175/3 176/25 177/6	152/9 152/14	80/15 80/24 82/15
187/12 187/17	152/15 153/11	83/18 83/19 84/22
187/20 199/6	153/11 157/5 157/8	85/6 85/14 88/14
207/18 208/2	158/4 158/11 160/9	89/5 90/13 91/4
basis [6] 29/21	160/9 160/17	97/25 111/11
34/14 126/17	162/13 163/10	115/21 121/12
139/24 165/15	164/23 164/24	127/8 135/3 136/1
184/20	165/3 165/11	136/15 143/7 152/3
Bates [7] 146/3	165/12 167/12	155/7 156/3 157/5
153/18 155/1 156/7	169/24 170/7 171/6	158/4 160/7 166/1
170/3 170/5 170/6	171/15 171/16	166/16 168/21
Baylor [1] 204/1	171/21 172/18	170/24 173/8
BB [1] 1/2	174/3 175/4 176/11	176/13 177/5 180/3
be [142] 5/18 5/20	177/16 179/21	180/7 187/9 187/11
6/4 14/11 15/7	180/2 180/3 180/20	187/22 188/6
17/10 18/11 18/12	186/19 188/22	188/16 194/24
18/12 19/25 26/5	188/23 192/1	194/25 196/2 196/8
27/2 27/14 28/11	192/17 195/5	197/1 197/15
28/15 29/4 35/1	198/21 199/4 200/5	199/22 201/14
35/23 35/25 36/13	200/5 202/4 202/12	207/21
44/21 45/23 48/4	205/19 206/22	become [1] 64/5
49/10 49/10 49/18	210/4 215/4 215/7	becomes [1] 199/20
49/19 49/24 50/1	216/12 217/3	been [58] 10/8
50/23 51/18 54/9	220/14 220/15	13/14 15/20 29/16
54/10 57/10 58/8	221/18	30/21 35/16 36/12
58/9 61/9 61/24	BEACH [1] 1/2	38/15 40/24 46/18
63/11 63/19 65/17	bear [1] 5/19	49/13 49/14 51/3
71/10 72/18 73/15	beautiful [2] 50/7	58/25 59/1 59/7
73/15 78/12 78/14	176/5	60/8 60/9 60/10
80/2 80/17 81/19	became [2] 154/12	60/18 63/9 75/15
83/3 84/9 84/11	179/22	75/15 85/3 90/6
86/21 89/15 91/6	because [87] 7/9	91/5 94/4 94/25
92/25 94/8 96/13	8/19 9/3 13/4	95/6 97/5 97/6

B	186/19 196/21	203/17
USCA11 Case: 22-11150 Document: 53-1 Date Filed: 11/30/22 Page: 217 of 254	be [16] 8/4	berserk [1] 135/5
been... [27]	112/9 164/25 194/2	besides [2] 217/16
100/12 100/18	221/3 222/18	219/23
101/11 101/21	behind [2] 11/21	best [5] 37/24
107/21 119/17	118/2	58/12 76/13 78/12
142/5 142/6 144/17	being [25] 9/20	78/14
146/9 153/23	11/10 13/22 34/22	BETH [1] 1/10
156/13 159/12	50/16 55/11 65/10	better [4] 13/6
162/11 172/12	71/3 82/8 83/18	36/10 51/24 90/18
186/1 191/16	85/1 91/9 93/22	between [39] 10/13
191/17 193/1	99/12 101/12 117/3	12/1 46/25 63/23
195/14 199/22	136/13 138/13	70/17 71/15 83/24
203/8 205/13	138/14 138/15	120/3 120/16 123/6
205/21 208/17	152/13 153/12	124/23 126/14
214/16 214/17	155/25 156/10	126/19 127/18
before [48] 1/10	182/6	127/23 128/10
5/13 6/2 11/2	believe [18] 33/6	129/10 133/23
32/12 38/14 44/12	76/12 76/13 79/15	134/23 145/8
48/1 57/19 61/6	85/11 96/17 111/8	145/23 146/8 148/8
64/1 64/5 73/25	111/13 122/1	149/7 151/10
78/25 86/20 89/14	129/25 140/22	151/22 163/25
89/16 93/5 106/17	162/10 193/19	164/11 164/23
108/9 108/20 112/6	209/16 214/13	175/12 175/13
112/14 112/23	215/1 219/3 221/16	176/22 183/25
114/7 114/22	believed [1]	206/16 213/6 217/1
114/24 116/2 116/5	176/18	218/9 219/10
118/23 143/5	believes [1] 96/9	221/11
156/14 163/1 163/8	believing [1]	beyond [1] 195/20
174/1 179/7 179/21	175/3	biased [1] 21/4
184/7 186/22	belong [3] 75/10	big [8] 36/13
187/20 188/14	194/11 194/12	43/19 59/18 62/20
207/4 208/24	belonged [1] 75/8	64/3 90/9 136/17
216/14 218/15	below [9] 30/14	136/19
219/19 221/24	114/4 125/5 129/25	biggest [1] 69/3
222/4	160/21 160/22	bill [3] 15/17
beg [4] 21/6 48/21	161/2 179/24	16/25 84/25
48/21 93/10	189/21	billion [16] 36/11
begin [5] 16/19	bender [1] 191/23	49/19 51/16 54/10
83/7 152/11 211/17	beneficiaries [1]	54/14 113/9 113/17
213/7	198/25	115/10 116/8
beginning [7]	benefit [1] 175/8	118/15 197/21
66/10 121/17 154/8	benefits [1] 58/12	198/4 198/12 199/8
175/25 176/7	Berkeley [1]	199/10 199/25

B	176/3 176/3 176/8	bottom [29] 17/22
billionaire [5]	176/9 176/20 177/11	192/5 23/12 47/22
198/16 198/23	179/16 180/1 180/2	50/16 52/20 61/14
201/10 201/14	180/22 182/14	65/4 67/2 70/22
222/8	182/24 188/2 191/7	74/7 98/11 104/5
billions [1] 29/6	193/8 193/15 194/5	113/24 120/7
bills [1] 83/25	194/14 194/14	123/12 124/4
binding [6] 71/2	194/16 194/17	135/14 146/3 152/1
71/22 72/3 72/6	195/7 195/12	153/18 155/1 156/7
78/2 119/16	195/18 196/18	166/4 166/5 182/22
Bing [2] 176/23	197/12 197/20	182/22 213/6 215/7
176/24	198/7 198/9 205/12	bought [6] 53/6
Biscayne [1] 1/14	206/15 210/5	56/18 56/19 84/17
bit [15] 7/24 8/17	217/10	105/10 125/8
25/1 48/14 50/1	Bitcoin-related [1]	Boulevard [1] 1/22
79/11 85/18 85/19	130/16	bound [2] 200/8
107/4 117/1 136/23	Bitcoins [4] 178/4	200/8
181/8 181/12	178/20 178/25	box [3] 34/19
191/18 204/21	206/3	109/3 217/9
Bitcoin [99] 11/21	black [1] 175/2	boxes [3] 153/23
12/24 13/23 13/24	bleep [2] 136/23	165/6 217/7
14/1 14/8 19/11	136/24	break [5] 60/2
19/16 19/25 41/15	block [1] 195/12	111/1 162/18
43/11 43/14 43/21	blockchain [6]	162/19 207/13
44/3 47/6 51/22	88/10 89/1 89/18	breakdown [1]
53/21 54/5 54/16	90/5 101/20 180/25	47/10
59/9 59/10 59/12	BLOOM [1] 1/10	BRENNER [2] 1/16
59/15 59/15 59/17	blow [1] 209/24	4/13
59/19 59/21 80/2	BlueHat [1] 176/23	bridging [5] 62/7
80/3 83/15 83/17	Bodog [1] 59/5	62/11 66/5 71/4
83/22 84/8 89/4	body [1] 57/21	71/6
89/5 89/6 89/8	BOIES [1] 1/15	Brigy [1] 136/19
89/25 90/11 90/22	bold [1] 88/7	bring [82] 5/25
102/2 116/7 116/22	Bond [1] 145/24	14/19 22/19 23/2
117/4 117/6 117/9	bone [1] 79/9	25/8 28/17 29/24
117/22 117/23	book [1] 27/3	31/11 40/7 41/23
118/2 118/4 118/5	books [1] 88/14	46/14 46/22 47/17
128/23 130/16	boss [1] 79/2	47/19 52/11 52/19
130/19 130/22	both [10] 19/12	53/11 53/24 61/5
131/16 132/3 133/7	34/19 71/22 91/11	61/11 63/22 65/6
134/9 138/25 141/9	106/2 134/1 167/3	66/6 66/23 69/6
174/10 174/15	167/4 182/24	70/19 70/24 71/25
174/22 175/7 176/1	221/19	72/13 86/10 87/4
	bother [1] 181/2	87/12 87/21 95/14

B	64/12 64/23 78/10	71/14 88/14 95/12
USCA11 Case: 22-11150 Document: 53-1 Date Filed: 11/30/22 Page: 219 of 254	79/12 80/1 80/17	172/11 172/12
bring... [48]	88/15 90/10 101/23	179/10 189/20
100/13 102/11	102/4 199/7	196/22 203/17
106/15 112/13	building [6] 49/25	204/13
113/22 114/8	80/18 101/23 102/1	calling [2] 4/6
114/16 120/14	199/14 220/15	79/4
120/18 123/9	built [3] 49/17	callout [1] 160/19
123/20 124/1	50/5 205/18	callouts [1] 25/3
124/21 125/17	bullet [1] 68/15	calls [2] 80/10
127/2 127/21 128/8	bunch [1] 43/10	219/24
128/19 129/6	business [24] 10/8	Calvin [9] 62/5
130/11 131/23	15/18 15/23 17/10	63/3 129/23 131/12
132/15 133/1 140/5	26/23 36/5 36/6	131/15 132/4 134/1
141/12 141/24	48/20 49/14 57/17	134/3 134/6
144/20 144/21	57/19 78/10 78/13	Calvin's [1] 59/6
145/5 145/20 149/5	82/9 82/13 82/16	Cambridge [1] 79/8
154/16 154/23	82/18 82/19 82/20	came [11] 17/5
163/2 163/6 164/20	83/20 85/25 194/24	23/24 38/13 43/4
165/19 166/11	195/5 196/25	79/21 86/1 139/4
168/4 181/7 184/13	businesses [2]	154/19 154/25
185/8 189/17	45/22 194/23	157/23 208/17
193/19 209/11	buy [10] 26/23	can [357]
209/12 210/14	27/1 48/8 51/18	can't [32] 17/12
215/16	54/5 56/4 59/19	26/8 43/15 63/5
British [3] 69/2	82/24 82/25 205/10	77/3 78/14 79/16
110/1 221/11	buyer [1] 80/19	111/11 121/11
broken [1] 41/1	buying [2] 53/4	126/24 134/7
broker [2] 57/24	78/7	140/22 141/17
58/14	C	142/19 142/21
Brooks [1] 47/5	cake [1] 21/16	143/9 143/18
brother [6] 18/2	Calay [2] 70/18	144/16 148/9
18/12 39/8 127/6	71/16	150/22 152/16
140/11 210/3	calculations [1]	153/10 159/4 159/5
browser [2] 176/24	180/18	159/6 160/7 167/22
176/25	call [16] 4/1 4/4	175/5 177/7 181/10
BS [1] 13/12	23/13 55/15 62/6	187/14 195/8
BTC [4] 116/22	66/3 72/1 72/11	cancels [2] 48/15
191/4 198/6 198/11	88/21 92/14 107/20	48/16
bucket [2] 89/14	169/9 188/22 202/6	cannot [7] 8/1
102/2	202/9 210/1	64/5 118/6 160/10
build [18] 36/4	called [14] 40/2	160/10 186/6 200/3
36/7 36/8 53/21	45/8 47/11 58/15	capacity [2] 31/1
55/9 57/14 57/14		95/9

<p>C</p> <p>capital [2] 58/9 175/24</p> <p>capitalist [2] 41/16 41/17</p> <p>capitalization [5] 26/18 26/25 197/25 198/1 198/4</p> <p>capitalize [1] 26/24</p> <p>capitalized [1] 88/1</p> <p>car [2] 27/1 27/2</p> <p>cards [3] 55/5 55/7 55/7</p> <p>care [7] 30/6 77/16 85/2 93/2 93/8 93/9 102/8</p> <p>careful [1] 192/17</p> <p>Carter [1] 6/24</p> <p>case [40] 1/2 4/4 4/6 12/7 12/8 12/14 34/21 96/12 108/9 111/22 115/9 116/6 116/9 116/25 118/14 122/24 134/20 148/3 168/15 174/21 186/2 186/5 186/5 186/8 186/9 186/13 186/15 186/18 188/10 188/13 199/20 203/8 206/18 206/19 206/20 208/23 219/22 220/19 220/21 222/7</p> <p>cases [1] 12/16</p> <p>cash [7] 45/22 48/19 83/18 83/18 90/11 117/7 196/19</p> <p>catch [1] 207/1</p> <p>Catherine [1] 70/4</p>	<p>cause [2] 64/11 74/18</p> <p>cc [1] 104/20</p> <p>cc'd [6] 33/6 65/23 65/24 65/24 129/24 132/4</p> <p>cc's [1] 87/8</p> <p>cent [1] 85/9</p> <p>center [3] 85/8 199/23 204/17</p> <p>central [1] 90/20</p> <p>Centrebet [1] 59/3</p> <p>cents [3] 84/20 84/21 84/23</p> <p>CEO [10] 58/1 58/5 58/5 77/7 99/13 99/15 144/15 160/9 171/2 198/22</p> <p>CEO's [1] 171/8</p> <p>CEOs [1] 58/13</p> <p>certain [6] 47/17 84/7 95/19 206/20 207/6 207/11</p> <p>certainly [16] 5/22 13/3 20/22 22/2 34/1 41/22 53/20 53/22 54/8 55/2 60/3 144/23 157/13 168/10 183/16 211/19</p> <p>Certificate [1] 2/2</p> <p>Certified [1] 224/5</p> <p>certify [2] 224/7 224/12</p> <p>cetera [5] 42/15 83/3 109/20 178/7 187/24</p> <p>CFO [4] 10/4 135/16 141/15 177/13</p> <p>chain [4] 98/11 102/13 104/5 153/4</p>	<p>chair [1] 5/24</p> <p>challenge [2] 15/16 64/5</p> <p>challenged [1] 15/19</p> <p>challenges [2] 62/20 64/2</p> <p>change [3] 118/6 118/9 194/17</p> <p>changed [1] 191/17</p> <p>changes [2] 98/2 116/22</p> <p>changing [1] 118/10</p> <p>channel [7] 116/2 168/14 170/16 174/9 181/24 190/13 200/21</p> <p>character [2] 192/15 193/3</p> <p>characterized [1] 69/12</p> <p>characterizing [1] 42/13</p> <p>charge [3] 11/8 106/3 106/6</p> <p>charged [2] 11/10 42/19</p> <p>charges [1] 37/17</p> <p>charging [2] 203/10 203/12</p> <p>charity [1] 222/5</p> <p>charter [1] 89/12</p> <p>chat [1] 164/2</p> <p>chats [1] 173/23</p> <p>chauffed [1] 51/19</p> <p>cheaply [1] 93/1</p> <p>check [7] 22/20 110/6 121/11 150/23 167/11 167/13 171/14</p> <p>checked [2] 110/8 182/3</p> <p>chef [1] 78/14</p>
---	---	---

C	64/13 67/21 85/15	52/16 53/17 54/9
cherry [1] 17/6	clearly [1] 85/10	73/13 74/1 74/8
cherry-picking [1] 17/6	clear [4] 104/15	75/23 82/15 86/16
Chesher [7] 10/4	157/5 170/15	86/16 88/2 88/6
20/7 34/8 126/3	170/18	89/7 99/9 100/1
128/11 135/16	client [2] 5/8	109/22
177/12	54/17	Coin-Exch [23]
chief [5] 58/2	clients [2] 49/18	24/16 25/11 25/16
68/22 106/13	49/21	26/6 36/3 36/12
146/16 146/16	clip [8] 58/18	41/2 52/16 53/17
choose [1] 178/7	73/7 73/19 105/15	54/9 73/13 74/1
chose [3] 23/24	105/19 129/9 179/2	74/8 75/23 82/15
27/8 73/15	196/11	86/16 86/16 88/2
chosen [1] 57/23	clocktime2020 [2]	88/6 89/7 99/9
chunk [2] 13/20	28/11 28/24	100/1 109/22
13/21	close [5] 56/13	Coinbase [7] 36/8
church [1] 179/23	188/10 188/13	36/10 49/19 54/9
CIO [2] 146/15	188/13 210/4	54/9 116/23 118/12
178/14	closed [1] 188/11	coins [2] 196/9
circles [1] 11/25	Cloudcroft [3]	197/15
circumstances [2]	52/15 53/4 53/18	collate [1] 136/20
97/16 139/10	CLR [1] 224/17	collateral [1]
City [1] 203/7	CO1N [5] 52/16	134/9
Civil [1] 4/6	53/17 55/3 179/9	colleague [2]
claim [11] 8/1	179/9	29/17 30/14
15/18 15/23 19/12	Cocomo [3] 46/18	collected [2]
33/13 101/17 115/9	46/20 46/21	153/19 206/13
175/1 184/4 199/23	code [23] 13/5	combination [1]
222/5	42/15 43/24 44/2	71/5
claimed [8] 15/17	47/2 47/2 47/6	combined [1] 114/6
19/18 19/20 45/24	48/4 48/6 48/7	come [15] 5/23
48/12 116/21 197/9	51/7 53/10 56/14	17/8 50/5 80/15
197/12	56/21 56/23 57/13	88/2 134/4 145/4
claiming [2] 48/15	57/13 79/20 80/20	155/21 162/3
117/19	86/14 88/9 89/3	179/25 180/4
claims [1] 117/12	174/17	182/24 183/20
clarify [2] 165/10	coders [1] 56/23	204/24 220/15
218/7	coding [2] 43/25	comes [1] 37/18
class [1] 53/16	172/8	comfortable [1]
Clause [1] 101/4	coffee [4] 17/7	39/3
Clayton [1] 15/17	17/8 17/8 84/25	coming [2] 93/3
clean [4] 63/25	Coin [23] 24/16	157/6
	25/11 25/16 26/6	commercial [1]
	36/3 36/12 41/2	44/10

C	company [96] 17/8	compete [2] 50/2
USCA11 Case: 22-11150 Document: 38-1 Date Filed: 11/30/2022 Page: 222 of 254	18/20 19/17 21/2	57/12
commodity [1]	23/19 23/21 24/3	competitive [1]
43/12	26/9 30/24 36/15	50/6
common [1] 68/9	39/7 39/8 40/2	competitors [1]
Commonwealth [2]	41/19 42/20 43/6	50/4
51/13 51/15	48/13 48/24 49/16	compilation [2]
communicating [1]	49/23 53/6 54/10	170/1 171/24
39/20	54/14 55/22 57/13	compiler [1] 55/2
communications [6]	57/15 58/6 59/3	complained [1]
24/20 128/24	59/6 59/6 62/11	84/22
140/10 149/10	67/23 67/23 69/3	complaining [1]
173/22 204/10	69/12 70/3 70/5	191/22
community [2]	70/6 70/6 70/18	complains [1] 24/4
118/7 118/8	70/18 71/15 72/19	complete [8] 8/23
companies [71] 8/5	75/12 77/2 77/3	8/24 10/25 11/1
8/12 10/23 11/10	77/8 78/3 78/4	13/12 37/2 83/15
13/21 19/11 38/16	78/9 78/17 84/3	224/10
39/19 39/24 41/7	84/6 84/13 85/15	completely [14]
42/10 51/4 52/15	86/23 92/6 92/17	7/22 8/25 9/1 9/2
52/17 54/11 56/15	94/18 99/13 99/16	18/3 40/6 82/4
56/18 57/7 58/11	105/10 106/3 106/9	89/1 89/5 125/23
62/13 63/4 64/18	109/9 109/23 110/1	155/8 170/16
64/19 64/22 73/17	123/7 125/7 128/24	174/24 184/10
75/8 75/10 75/12	131/15 134/4	completing [1]
75/14 78/25 79/24	137/25 165/4	204/12
80/11 83/3 83/10	172/11 175/14	completion [1]
93/9 99/24 100/1	175/14 175/21	33/23
100/4 100/18 101/2	175/21 180/13	complex [4] 45/20
101/3 101/4 101/19	184/1 185/12	51/10 51/11 55/16
101/22 101/25	185/14 185/17	compliant [1]
104/21 105/6	185/18 188/13	89/15
106/11 108/7 109/5	194/12 194/12	comply [1] 221/14
109/12 109/14	194/19 194/20	component [1]
110/2 110/3 116/23	194/21 194/25	25/13
117/13 118/11	195/4 196/1 196/1	components [1]
127/9 134/6 134/8	196/2	212/11
153/21 153/22	company's [2] 33/5	compromising [1]
175/18 176/17	195/1	54/25
176/19 178/7	comparative [1]	computer [10] 53/3
180/13 194/21	51/12	55/6 152/16 168/8
195/6 196/2 198/22	compare [1] 219/4	179/10 179/11
companies' [1]	comparing [1]	179/12 203/25
91/2	155/13	204/1 204/3

C	consequences [2] 97/18 97/20	61/10 112/6 112/18 115/23 133/20
USCA11 Case: 22-11150 Document: 38-1 Date Filed: 11/30/22 Page: 223 of 254 computers [11] 53/9 85/8 146/6 165/1 165/2 165/4 179/21 179/22 191/17 191/19 191/20	consequently [1] 185/18	145/1 159/13 163/11 183/21 200/17
concept [2] 95/5 117/6	conservative [1] 49/7	continued [6] 2/5 3/1 6/11 59/25 108/25 112/19
concern [2] 88/9 162/10	consider [4] 82/2 97/7 179/13 179/14	continues [1] 213/7
concerned [1] 146/9	consideration [4] 97/18 100/24 101/2 161/9	continuous [2] 9/1 59/1
concerns [1] 79/18	considered [1] 97/20	continuously [1] 41/19
concluded [1] 114/19	considering [1] 97/13	contract [5] 67/4 70/17 101/3 176/4 185/22
conclusion [2] 49/6 57/4	consistent [2] 60/8 89/1	contractors [1] 165/5
conclusions [1] 207/5	constant [1] 9/2	contracts [4] 33/24 177/24 184/6 185/17
conditions [1] 134/11	constrains [1] 90/21	contractual [2] 66/3 66/3
conduct [2] 206/15 220/20	constructed [1] 187/17	control [8] 124/24 187/18 187/19 188/1 196/5 198/14 198/21 200/7
confer [4] 111/24 221/15 221/20 222/11	consulting [2] 203/17 206/10	controlled [2] 57/7 214/19
conference [2] 176/23 222/21	contact [3] 18/1 29/16 81/3	controls [1] 141/8
confidence [2] 17/13 18/5	contacted [2] 8/25 35/16	conversation [3] 126/8 126/24 129/9
confirm [1] 185/16	contacts [1] 59/23	convince [2] 101/24 102/1
confounding [1] 191/18	contained [3] 166/25 207/11 211/13	copied [2] 40/3 83/3
confused [1] 190/15	contains [4] 166/24 209/1 215/4 224/12	copies [2] 10/14 40/4
confusing [1] 43/9	content [4] 207/9 207/15 207/16 207/25	copy [5] 44/11 82/24 82/25 118/3 218/24
confusion [2] 170/15 170/18	contents [4] 153/24 192/21 217/25 218/1	Coral [1] 1/22
Congratulations [1] 65/25	context [1] 208/3	cords [1] 136/7
Conrad [1] 6/24	continue [14] 5/13 6/10 9/13 60/16	
consents [1] 10/12		

C	106/13 107/25	49/16 49/20 49/23
USCA11 Case: 22-11150 Document: 58-1 Date Filed: 11/30/2022 Page: 224 of 254	109/6 113/3 113/13	50/1 50/3 50/4
core [23] 43/19	116/12 130/3	55/23 56/4 57/22
45/10 51/9 51/14	130/18 132/6 132/7	57/22 64/5 75/16
51/14 55/4 86/15	136/8 152/10 153/8	76/12 76/21 79/12
87/22 88/10 88/25	153/13 153/19	79/12 80/2 80/7
89/18 90/1 90/1	160/6 160/7 160/14	82/20 84/17 85/3
90/5 90/6 96/4	160/22 160/24	85/3 86/20 88/25
96/9 97/7 97/11	161/2 161/15 170/9	89/8 94/1 101/19
97/14 101/20 114/5	170/10 170/19	110/24 111/12
116/24	171/7 174/23 175/8	111/24 119/17
cores [4] 55/6	176/2 178/5 179/1	129/13 129/14
55/8 55/11 136/7	179/16 183/2 184/7	130/1 135/16
corner [8] 19/5	195/1 195/13	138/21 150/10
20/5 30/3 92/3	195/23 197/21	151/7 153/11
94/14 113/24	198/9 198/13	153/11 154/16
120/21 124/5	198/16 201/1 204/6	154/17 160/9 160/9
corporate [9] 84/1	209/23 213/11	160/17 165/7
85/1 109/18 144/15	214/12 216/20	167/12 167/14
160/9 184/19 192/2	219/21 224/10	169/21 170/14
194/10 195/25	correction [3]	171/4 171/14
corporation [3]	136/7 171/20	172/14 176/9
97/16 204/13	171/21	176/13 179/25
204/24	correctly [1]	180/21 181/8
corporations [2]	42/13	187/20 187/21
113/2 146/22	correspondence [2]	192/20 192/24
correct [100] 17/4	24/24 25/2	195/9 196/8 196/9
18/19 21/10 22/9	cost [20] 15/24	197/3 197/15
22/13 27/7 27/11	15/25 17/9 17/11	197/16 205/10
36/24 37/16 39/12	19/15 19/19 21/2	207/22 209/24
39/25 40/13 40/14	35/1 46/2 46/7	211/18 212/25
41/8 41/21 42/12	46/16 46/17 48/2	213/22 214/25
42/23 43/2 43/3	48/3 49/7 51/3	215/16 216/5
43/20 49/12 52/2	51/16 57/7 93/1	216/21 217/18
52/16 56/12 57/25	142/20	218/18 220/9
58/15 58/24 62/21	costs [4] 12/15	couldn't [10]
64/20 67/10 67/11	12/15 49/8 85/9	43/19 43/22 43/23
67/25 68/13 71/23	could [100] 19/12	51/20 51/20 59/21
72/19 73/3 73/5	20/9 24/7 30/8	91/16 147/24 180/4
73/14 83/8 83/11	34/23 34/25 36/1	195/9
86/2 89/4 90/5	36/8 36/9 36/17	counsel [40] 4/7
91/3 93/23 93/25	37/23 37/25 39/9	4/8 7/7 14/14
98/21 100/2 101/20	39/9 39/10 42/25	27/16 44/5 50/14
104/20 105/5	44/2 49/10 49/13	61/12 62/24 65/1

C	221/13 221/17	166/23 166/23
USCA11 Case: 22-11150 Document: 53-11 Date Filed: 11/30/2022 Page: 223 of 264	221/18 221/23	175/12 198/8 208/8
counsel ... [30]	222/3 222/9 222/10	209/21 210/3
69/7 70/11 70/12	222/11 224/6 224/9	212/17 214/11
74/5 75/20 81/9	Court's [3] 15/6	217/4 217/4 218/25
86/5 92/1 98/9	169/23 171/24	219/20 219/23
100/14 102/12	courtroom [3]	220/5
106/16 115/13	220/16 220/21	craig.wright [4]
118/25 120/1	222/21	99/17 104/23 171/1
142/15 161/18	courts [2] 39/23	217/24
163/18 164/9	89/2	craigwright [1]
164/21 168/5	covenant [3] 199/1	159/5
171/22 173/10	199/6 199/12	crashed [1] 83/23
177/10 181/6	covenanted [1]	create [7] 80/5
184/14 188/24	199/2	94/5 186/6 208/15
192/8 200/19 202/5	covenants [1]	213/12 213/14
countries [2]	198/25	214/21
43/10 178/19	CPU [2] 180/7	created [25] 40/2
country [1] 11/5	180/9	80/11 108/14
couple [1] 218/15	CPUs [1] 180/16	116/22 117/6 184/5
course [5] 111/25	craig [74] 1/7 2/5	185/2 185/14
111/25 112/11	4/7 20/9 28/5 28/5	185/25 187/5 187/6
171/18 203/2	31/7 32/17 33/21	187/7 187/8 208/4
Coursera [1]	68/21 69/13 71/16	212/13 213/18
109/15	95/1 95/8 96/6	214/11 214/13
court [56] 1/1	96/10 102/14	214/17 216/11
1/23 1/24 4/1 11/4	102/20 102/22	216/15 216/17
12/7 12/8 12/11	103/3 103/4 104/19	217/13 219/23
12/16 14/7 14/25	104/22 104/23	220/5
19/22 34/18 34/24	105/16 106/21	creating [5] 54/4
35/1 35/2 60/2	124/8 124/9 131/9	110/18 158/12
60/12 108/9 115/14	139/5 139/12	199/4 213/15
115/18 148/3	151/25 153/3	creation [2] 53/16
151/13 157/2	155/11 155/11	89/4
161/18 162/10	155/11 155/14	creator [2] 118/5
162/15 165/12	155/14 155/17	212/16
169/1 169/13	155/17 158/12	creditor [1] 84/24
170/12 170/24	159/1 159/2 159/16	creditors [2]
181/2 186/2 186/5	159/16 159/25	84/12 88/2
186/13 186/15	160/2 160/5 160/5	credits [2] 8/1
186/18 188/10	160/8 160/8 160/15	8/1
188/12 189/24	160/16 162/4 162/7	criminal [3]
193/1 194/3 202/18	165/23 165/23	196/21 206/6 206/9
203/1 213/20	166/1 166/22	crisis [1] 177/6

C	cv [1] 1/2	147/15 147/23
critical [1] 13/15	Cyber [2] 203/18	148/1 148/3 148/8
cross [2] 111/21	203/19	148/16 149/7
201/20	D	149/10 149/19
cross-examination [2] 111/21 201/20	damages [2] 117/12	149/24 150/21
CRR [1] 224/17	197/23	151/10 151/22
crucial [1] 13/3	damn [2] 36/14	152/1 152/9 152/14
crypted [1] 194/5	37/21	153/13 158/12
cryptocurrency [4]	dark [1] 205/7	163/25 164/23
36/9 102/3 102/6	darknet [1] 205/10	166/4 166/25 172/6
196/19	darn [1] 190/14	172/7 172/9 172/10
cryptographic [29]	data [5] 85/8	172/10 172/10
203/23 204/10	208/2 208/2 215/22	172/12 172/13
207/11 208/11	216/8	172/13 172/13
208/12 208/13	database [8]	173/2 174/11
208/19 211/12	117/10 117/22	174/17 174/22
212/5 213/3 213/5	117/24 118/1 118/1	175/13 175/13
213/10 213/14	118/2 146/18	176/1 176/15
213/16 213/17	178/15	176/16 176/18
213/25 214/2	date [10] 20/4	176/18 177/15
214/10 215/7	22/20 23/9 23/10	177/16 177/24
215/12 215/13	24/8 24/11 52/3	178/3 178/10
216/8 216/11 217/5	94/25 101/7 186/22	178/13 178/20
218/2 218/4 218/9	dated [9] 11/14	178/21 179/7
218/10 219/5	12/22 23/5 48/1	179/15 179/17
CSR [1] 224/17	94/15 183/6 183/10	180/19 181/24
CSW [2] 11/24	184/2 185/12	182/1 182/2 182/7
116/4	dates [2] 7/11	182/7 182/14
CTO [2] 146/15	91/16	209/20 210/7
178/14	Dave [104] 6/22	214/11 214/13
CUDA [1] 55/4	6/23 11/20 12/23	214/16 214/21
culminated [1]	13/3 13/13 18/11	Dave's [7] 18/10
12/7	25/21 25/22 27/13	29/18 29/19 33/23
currency [1] 54/5	28/15 28/25 30/6	34/19 74/20 141/17
current [1] 97/9	30/12 35/10 45/9	Daves [1] 172/15
currently [3]	47/11 47/13 48/5	David [3] 1/4
95/18 96/5 203/17	88/15 126/6 126/15	27/14 218/15
customer [3] 49/17	126/24 127/6 127/8	day [23] 1/9 23/6
78/13 78/14	127/18 127/20	24/16 24/22 24/22
customers [4]	140/11 141/15	24/23 25/10 32/10
36/15 36/16 78/11	142/4 145/8 145/16	32/15 56/21 73/17
89/16	145/18 145/23	73/17 81/23 83/13
	146/8 147/8 147/10	92/18 92/20 108/15
		111/14 183/14

D	5/15 21/25 22/3	90/15
USCA11 Case: 22-11150 Document: 53-1 Date Filed: 11/30/22 Page: 127 of 254	30/25 40/25 46/2	depreciated [1]
day ... [4] 188/12	46/7 89/17 127/7	27/2
222/10 224/9	155/25 175/15	Des [2] 10/6 10/7
224/15	187/23	describe [7] 57/18
days [10] 11/18	Defense's [1]	205/2 205/16 206/8
11/25 12/1 17/25	205/6	207/16 208/11
56/24 56/25 60/7	definitely [1]	219/12
116/5 136/18 178/2	140/23	describing [1]
days' [3] 24/1	definition [2]	13/10
77/21 77/22	93/14 149/25	design [5] 54/23
de [1] 1/22	degrees [1] 108/18	56/1 174/19 178/7
dead [4] 18/13	delay [1] 10/9	204/9
93/4 179/14 214/16	delays [1] 76/14	designed [5] 56/1
deal [11] 43/10	demonstrated [1]	155/5 155/7 176/4
64/18 68/21 77/20	53/7	178/4
80/19 80/21 84/13	DeMorgan [28] 57/7	designs [1] 53/4
84/19 84/20 100/5	67/23 69/11 70/6	despite [2] 104/14
134/7	71/15 82/7 82/12	153/12
Dear [2] 20/7 28/5	94/14 94/25 95/16	details [6] 10/12
death [1] 33/23	96/5 96/9 96/10	29/16 30/15 107/4
debt [9] 8/6 8/8	97/6 97/12 97/19	126/25 151/23
8/11 84/18 85/15	97/19 99/15 100/7	determine [10]
85/17 85/17 85/18	104/9 106/4 106/5	42/11 42/22 88/3
85/19	119/15 120/4 123/7	117/10 205/19
deceased [2] 127/6	123/23 123/24	205/22 205/25
140/11	128/23	206/21 207/6 212/9
December [6] 12/13	demorgan.com.au [1]	developed [1] 43/4
83/17 99/8 160/2	99/17	developer [1]
179/11 209/21	Denariuz [2] 89/7	118/6
deed [10] 33/4	109/21	developers [2]
70/15 71/15 100/17	denied [4] 7/4	116/24 178/16
104/11 120/3	29/12 173/7 185/24	development [6]
120/16 185/6	Denis [1] 184/1	25/19 54/22 55/20
185/22 199/12	dense [1] 212/4	55/22 109/18
defendant [8] 1/8	deny [2] 117/17	204/16
1/19 112/9 156/18	176/1	DEVIN [2] 1/13 4/9
157/10 206/17	depends [2] 111/15	dictated [1] 142/7
221/15 222/18	178/22	did [102] 11/7
Defendant's [1]	deposition [6]	13/13 16/19 16/20
209/4	58/19 73/8 73/20	16/21 16/23 18/11
Defendants' [2]	105/16 105/20	19/10 19/16 19/20
125/16 127/16	179/3	20/17 20/20 20/23
Defense [13] 1/4	depository [1]	21/13 24/7 24/21

D	33/14 33/16 34/24	191/6 195/20 196/2
USCA11 Case: 22-11150 Document: 53-1 Date Filed: 11/30/22 Page 228 of 254	38/8 39/11 45/13	198/1 204/17
did... [86] 24/24	45/17 48/17 50/9	213/15 217/6
25/2 27/13 41/22	53/8 54/16 55/19	differently [1]
42/10 42/20 50/10	56/15 59/6 68/14	139/14
57/13 59/23 62/19	69/4 72/23 77/4	difficult [7] 23/8
64/8 64/10 66/4	78/1 79/23 80/3	40/17 45/21 146/12
73/5 75/10 78/16	80/3 80/4 80/4	176/7 179/22 210/4
78/25 81/1 84/21	80/5 83/18 84/15	difficulties [1]
84/23 94/5 94/18	84/20 85/5 85/13	196/16
98/6 100/8 105/7	89/9 99/22 103/22	difficulty [3]
105/9 105/11 106/2	109/8 117/25 127/9	179/19 179/20
106/11 110/12	159/18 165/7	180/5
127/10 131/10	165/15 174/16	digital [8] 35/24
136/21 145/18	174/25 178/10	102/7 117/7 196/19
145/19 146/3	178/16 180/25	199/9 199/14
147/10 148/1	182/9 187/22	203/22 208/19
148/16 148/20	196/24 205/20	digits [2] 43/21
148/25 149/1	207/1 211/16	43/21
149/19 149/23	die [1] 93/3	direct [7] 2/5 2/7
150/3 150/6 151/5	died [2] 25/21	6/11 68/21 111/14
159/15 164/24	179/7	112/19 203/3
165/11 167/1 171/3	dies [1] 6/22	direction [1]
171/4 174/11	difference [4]	74/17
174/14 177/1 178/7	36/17 49/21 89/9	directly [2] 136/5
178/17 178/18	117/20	136/19
178/20 180/10	differences [4]	director [15]
184/3 188/2 188/5	41/13 45/22 217/1	10/12 21/19 23/23
193/15 195/4 195/5	219/10	23/24 31/2 64/8
195/5 204/12	different [43]	73/15 73/16 77/7
204/14 204/24	18/20 19/8 21/4	78/6 92/5 99/12
205/3 205/16 206/5	21/7 25/1 45/18	172/13 172/14
206/7 206/8 206/18	47/7 50/11 70/18	206/10
212/9 214/22	86/21 89/11 90/14	directors [5] 64/4
214/24 215/13	108/17 108/21	165/5 165/5 175/22
215/15 215/22	109/12 109/14	195/25
215/24 217/15	109/19 113/2 113/2	directors' [1]
221/14	135/4 139/13 155/8	195/2
didn't [66] 9/17	155/8 155/10	directorship [5]
9/17 9/21 12/15	156/12 162/2 162/3	39/6 64/10 77/10
18/7 18/10 19/15	165/24 165/25	77/10 77/12
21/2 21/9 23/8	167/3 167/4 168/21	dirty [2] 188/8
24/4 24/18 27/12	170/16 173/25	188/14
28/10 28/12 28/14	178/19 178/23	disagree [1] 35/3

D	document [128]	207/9 207/17
USCA11 Case: 22-11150 Document: 53-11 Date Filed: 11/30/2022 Page: 229 of 254	7/18 11/2 14/17	207/18 208/4 208/6
disappeared [1]	15/4 16/18 19/2	208/14 208/16
191/24	19/21 20/2 24/10	209/1 210/19
discount [1] 51/20	25/7 26/2 28/7	210/21 212/3
Discovery [1]	28/22 29/22 30/4	212/12 212/13
156/4	30/18 30/20 30/23	212/15 212/16
discuss [6] 75/4	31/4 31/9 33/13	213/5 213/6 215/3
132/19 177/15	33/16 33/17 35/13	215/4 219/13
192/18 220/18	37/9 40/17 40/18	document's [3]
222/3	44/12 44/16 46/10	14/24 93/19 207/25
discusses [1] 86/1	48/11 48/14 52/5	documentation [5]
discussion [4]	58/17 66/13 75/1	20/8 96/8 96/11
116/20 135/18	76/5 86/3 87/15	104/9 148/2
158/19 164/1	89/23 91/10 93/16	documented [2]
displaying [1]	94/5 94/6 94/14	48/7 108/11
161/1	94/24 99/2 103/14	documents [45]
dispute [2] 8/15	103/14 103/23	5/15 5/17 5/19
8/16	105/12 105/13	17/6 19/9 20/3
disputed [2] 7/10	106/23 107/2 108/5	25/4 30/25 32/22
7/12	114/7 114/22	35/10 38/7 90/7
disputing [1] 90/3	114/24 119/1 119/4	108/23 111/11
distinction [1]	120/22 120/23	118/22 133/23
117/24	121/10 121/11	143/17 156/11
distributed [2]	121/14 121/15	156/15 157/7 170/1
91/6 180/2	121/15 121/17	176/14 178/2
DISTRICT [8] 1/1	121/24 122/19	182/12 182/15
1/1 1/10 1/24	124/11 131/7 135/2	184/17 191/16
206/12 224/3 224/6	135/21 136/4	191/17 196/23
224/7	136/18 137/20	206/21 206/22
dive [1] 208/25	143/5 144/2 144/16	206/24 207/2 207/6
dives [2] 138/14	144/19 148/20	207/10 207/11
138/15	151/12 154/3 156/5	208/3 208/22
divide [1] 56/23	156/10 157/4	208/23 208/24
DIVISION [1] 1/2	158/13 158/15	209/5 209/8 209/9
divorce [3] 126/8	169/22 169/24	210/17 214/22
126/24 164/2	170/16 170/17	does [24] 10/20
divorced [1]	171/15 172/2	18/15 29/19 41/19
176/12	175/10 175/11	47/3 48/8 78/22
do [325]	183/6 183/10	96/6 105/25 150/10
doctor [2] 119/15	183/11 183/20	156/20 157/12
119/17	184/2 184/5 185/23	167/1 195/14
doctorates [1]	185/25 189/17	198/10 201/1 202/2
108/21	192/18 192/25	213/12 213/13

D	221/11 221/12	173/22 173/23
USCA11 Case: 22-11150 Document: 53-11 Date Filed: 11/30/2022 Page: 230 of 254	221/12	174/17 175/10
does... [5] 214/18	domain [1] 146/18	176/16 180/7 181/4
216/8 217/22 219/4	don't [128] 7/13	182/16 183/7 186/7
219/9	7/23 14/6 14/25	191/25 194/12
doesn't [44] 15/21	29/16 30/7 30/18	194/21 194/22
26/21 26/25 36/1	30/20 30/23 31/4	195/8 196/3 196/15
36/4 36/5 36/16	31/9 31/12 37/2	196/17 197/10
37/23 38/6 40/12	37/20 41/13 46/3	199/17 199/18
43/14 45/17 57/23	48/19 48/24 50/10	220/11 221/12
74/2 75/23 80/21	51/10 52/3 57/17	222/8
82/21 88/12 92/17	58/16 59/12 59/14	done [17] 15/20
101/11 102/20	59/17 62/22 63/11	15/22 35/6 36/25
104/22 104/23	73/6 73/17 74/3	42/21 45/9 50/1
121/8 121/12	74/9 74/18 74/24	51/14 70/17 80/9
122/19 123/13	75/24 77/14 77/16	90/14 110/7 117/11
124/6 124/8 124/12	78/12 79/10 79/21	178/9 179/9 180/2
134/6 134/7 135/3	80/17 80/17 84/5	182/6
139/11 139/12	84/18 85/2 90/18	door [1] 200/13
145/25 151/24	92/18 93/2 93/7	Dorian [14] 4/20
157/13 157/23	93/9 98/7 102/8	209/11 209/24
159/5 162/4 175/16	102/20 103/5 103/5	210/13 211/25
178/12 195/14	104/8 106/5 106/11	212/25 213/9
doing [27] 13/5	106/12 110/13	213/22 214/25
16/1 48/25 51/3	111/3 111/25 112/1	215/16 216/5
52/14 56/5 56/21	114/24 123/25	216/21 217/18
56/24 76/17 90/8	124/8 125/6 125/9	218/18
92/19 93/5 96/17	126/4 126/23	Dornbreg [1]
102/8 106/6 108/17	127/10 129/12	172/14
108/18 108/20	130/17 136/18	dot [3] 80/2 80/2
109/25 110/1	139/11 143/18	80/2
110/18 111/21	144/15 145/24	Double [1] 85/7
127/8 196/21 197/2	146/23 147/9	doubt [1] 208/25
210/6 217/10	147/11 147/24	doubts [1] 76/17
dollar [5] 8/11	147/25 151/11	down [35] 24/2
54/10 54/14 84/20	153/6 153/9 157/11	25/3 31/13 47/22
84/21	157/20 160/7	49/1 54/16 59/11
dollars [22] 12/12	160/10 160/11	59/22 65/4 70/10
17/11 36/12 49/9	160/16 160/17	77/24 83/23 84/24
49/12 51/17 59/10	160/21 160/23	102/14 103/10
59/13 59/16 59/20	160/25 160/25	108/9 115/6 136/4
59/22 68/23 68/24	161/4 164/1 166/16	151/17 159/20
77/21 79/22 83/24	166/18 167/22	160/19 162/16
176/9 197/3 198/13	170/5 172/15	172/24 173/18

D	draft [25] 36/23	121/17 219/6
USCA11 Case: 22-11150 Document: 53-1 Date Filed: 11/30/22 Page: 231 of 254	37/13 38/22 94/5	earlier [9] 89/2
down... [11]	152/3 152/4 154/7	119/16 133/19
181/13 188/3 189/3	154/11 155/5	134/20 168/15
189/3 189/10	155/24 155/25	175/10 176/7 182/1
190/21 192/23	156/3 157/15	215/9
207/13 210/22	158/13 158/17	early [6] 49/16
211/6 215/17	159/15 159/18	55/20 55/22 76/14
download [1] 83/1	161/14 215/4	192/3 198/7
DR [344]	216/10 216/17	earth [4] 29/3
Dr. [33] 5/3 5/6	216/25 217/1	77/23 78/12 199/8
5/8 10/3 20/9 31/7	217/12 218/25	easier [2] 45/23
33/21 46/5 63/7	drawn [1] 10/10	53/23
95/21 101/10 107/6	dream [1] 77/23	easily [3] 34/23
111/19 194/3 202/9	dreamed [1] 174/10	110/8 175/24
203/5 207/21	drew [1] 207/5	Eastern [2] 212/21
209/19 210/15	drinking [1] 80/8	216/12
210/17 211/10	drive [1] 138/13	easy [4] 13/7
211/20 212/3	driven [5] 92/12	23/14 53/22 110/6
212/22 215/3	93/6 93/14 95/1	eat [1] 21/16
215/20 217/12	95/7	eCash [1] 177/1
217/15 217/22	driver [2] 79/2	economic [1] 176/6
218/13 218/14	92/14	economist [1]
221/1 222/4	drives [1] 95/4	200/2
Dr. Craig [3] 20/9	driving [1] 92/15	economy [1] 199/9
31/7 33/21	dumb [2] 37/4	edited [1] 13/4
Dr. Edman [15]	83/19	edits [1] 219/12
111/19 203/5	Dunes [1] 191/2	EDMAN [26] 2/6
207/21 209/19	during [13] 29/2	111/19 202/9
210/15 210/17	39/19 42/10 84/16	202/11 202/14
211/10 212/3 215/3	105/3 116/24 148/3	202/22 203/5 203/7
215/20 217/12	191/15 204/7 205/6	204/20 207/21
217/15 217/22	206/5 208/8 212/23	209/19 210/8
218/13 221/1		210/15 210/17
Dr. Edman's [1]	E	211/10 212/3 215/3
211/20	E-Discovery [1]	215/9 215/17
Dr. Matthew [1]	156/4	215/20 216/8
202/9	e-gold [1] 196/20	217/12 217/15
Dr. Wright [13]	EA [4] 63/10	217/22 218/13
5/3 5/6 5/8 10/3	136/19 142/6 171/4	221/1
46/5 63/7 95/21	each [13] 4/22 6/5	Edman's [1] 211/20
101/10 107/6 194/3	9/13 19/7 24/13	educational [1]
212/22 218/14	33/13 76/15 84/8	203/24
222/4	98/20 101/4 112/16	effective [1]

E	90/11 199/25	entities.' [1]
effective... [1]	enables [1]	entitled [4]
101/6	encourage [1]	87/9
effectively [2]	176/5	87/10 94/14 96/2
8/15 117/21	encryption [1]	entitles [1]
eight [2] 55/7	54/24	109/24
84/8	end [14] 63/1	entity [7] 63/25
EITC [1] 114/5	63/23 69/4 84/11	96/10 96/11 109/9
either [1] 124/13	91/11 102/14	109/23 197/11
electric [1] 57/21	108/14 108/19	197/11
electronic [1]	124/9 152/11	equipment [1]
208/13	158/19 177/5 206/5	162/21
else [9] 24/6 24/6	213/8	equity [3] 68/7
26/10 48/23 80/24	ended [6] 12/7	68/13 72/16
89/9 117/12 160/16	19/24 79/4 82/9	equivalence [1]
214/20	176/12 177/7	221/10
email [243]	ends [1] 155/25	equivalent [5]
emailed [2] 41/20	enforcement [1]	11/4 14/7 23/25
140/24	205/21	108/15 109/15
emails [25] 28/4	engineering [1]	erroneous [2]
29/6 32/17 34/20	57/6	134/22 134/22
38/15 38/22 74/1	England [1] 156/13	error [2] 83/16
74/16 76/14 102/22	enhanced [1] 43/7	185/21
125/19 126/19	enough [4] 24/4	errors [1] 135/17
127/5 127/20 135/5	28/11 59/21 79/23	ESQ [10] 1/13 1/13
136/13 140/12	enrolled [2]	1/16 1/16 1/17
146/8 148/17	108/17 108/20	1/19 1/20 1/20
148/19 149/3	ensure [4] 33/23	1/21 1/21
149/20 156/22	58/5 83/7 187/7	essence [1] 208/21
164/13 183/25	enter [2] 68/21	essentially [1]
embarrassed [1]	99/25	81/2
146/23	entered [4] 87/19	establish [3] 91/3
embedded [2]	184/6 185/6 185/17	169/3 206/15
207/10 212/12	entering [1] 87/20	establishing [1]
Emperor [1] 191/2	enterprise [2]	183/19
emphasize [2]	196/23 196/24	estate [13] 1/4
77/11 77/18	entire [4] 12/5	13/17 28/25 30/5
employed [3] 99/18	24/23 144/2 179/10	30/12 30/16 31/2
106/4 203/16	entirety [2]	35/16 35/17 35/20
employer [1]	169/13 169/14	35/22 75/8 75/10
203/13	entities [9] 9/13	estimate [1]
enable [6] 52/24	41/1 82/6 95/19	114/20
53/15 54/4 54/21	96/5 96/6 96/18	estimated [1]
	109/10 119/16	114/4

E	22/6 22/14 22/23	112/19 201/20
estimation [4]	22/23 24/20 24/21	202/3
46/8 46/19 48/3	24/22 77/9 78/21	examine [3] 209/1
48/3	79/11 80/9 84/23	215/13 220/3
et [6] 42/15 83/2	84/24 85/9 89/14	examined [1] 213/3
109/20 175/2 178/7	136/16 136/21	Excel [4] 105/12
187/24	136/21 175/21	105/13 107/2
evaluate [1] 46/17	180/7 196/19 209/1	107/21
evaluation [7]	everybody [1]	Except [4] 24/5
42/18 46/16 49/3	202/19	45/13 48/16 136/7
49/6 49/7 50/17	everyone [13] 4/2	Exch [23] 24/16
51/3	4/3 4/3 5/10 5/11	25/11 25/16 26/6
even [32] 8/18	35/23 37/5 84/5	36/3 36/12 41/2
12/15 14/1 15/22	85/4 89/9 118/9	52/16 53/17 54/9
16/17 16/23 17/7	136/15 182/8	73/13 74/1 74/8
36/10 36/13 37/19	everything [17]	75/23 82/15 86/16
37/21 43/23 55/18	7/21 15/14 18/2	86/16 88/2 88/6
56/3 59/9 59/21	20/16 20/17 37/24	89/7 99/9 100/1
146/23 152/4	84/23 84/24 106/6	109/22
154/19 154/21	135/2 135/2 149/25	exchange [26] 36/8
157/23 168/24	153/20 175/4	36/9 45/17 49/15
176/19 179/7	178/14 194/19	64/12 66/4 75/15
179/24 180/19	220/20	83/21 84/2 89/6
197/3 197/3 209/7	evidence [255]	89/14 89/24 90/11
209/9 214/3 219/6	evil [1] 191/23	92/18 100/11
evening [5] 220/14	eviscerate [1]	101/22 102/3
220/17 220/24	80/7	109/22 142/5
222/24 222/25	ex [5] 2/8 3/2	146/15 146/17
event [2] 87/25	13/20 165/5 165/5	146/20 155/9
139/10	ex-directors [1]	178/15 205/11
eventually [7]	165/5	221/10
19/23 85/20 154/8	ex-staff [1] 165/5	exchanges [1] 84/1
154/12 156/6 156/8	ex-wife [1] 13/20	exclusive [3] 82/9
188/7	exact [3] 24/16	91/7 100/5
ever [12] 16/23	158/10 161/12	excuse [2] 61/1
36/25 37/1 37/20	exactly [8] 18/5	122/11
37/25 77/22 127/9	29/15 56/5 106/5	executed [10]
150/2 151/6 194/22	180/21 180/23	66/20 66/21 66/22
196/15 204/12	192/12 222/8	67/5 67/16 67/18
every [32] 9/1	exaggerated [1]	67/19 68/3 73/25
13/25 16/21 16/23	79/1	74/1
17/5 17/6 18/20	examination [9]	executive [2] 85/1
20/16 20/19 22/6	2/5 2/7 6/11 38/10	85/4
	111/14 111/21	executor [6] 28/24

E	215/17 215/20	expletives [2]
USCA11 Case: 22-11150 Document: 53-1 Date Filed: 11/30/22 Page: 234 of 254	216/5 216/9 216/18 216/19 216/21	
executor... [5]	216/25 216/25	exploit [2] 17/14
30/5 30/12 30/16	217/2 217/3 217/19	78/22
31/2 35/9	217/22	exploited [1] 36/2
exercise [1] 19/10	exhibits [2] 7/14	expose [2] 88/25
exhibit [95] 9/19	211/4	101/20
11/18 15/9 28/1	exist [2] 174/25	exposed [3] 89/17
42/7 44/23 50/25	175/16	90/4 116/23
62/1 63/21 65/19	existence [1]	exposes [1] 88/9
69/25 71/12 74/14	150/2	exposing [1] 90/5
76/10 81/21 87/3	existing [3] 50/2	extent [3] 10/17
94/10 99/5 104/1	150/2 187/18	88/3 206/21
107/16 115/13	exists [1] 167/12	external [4] 16/24
115/16 115/18	exonerated [1]	16/25 17/8 42/18
119/23 120/13	11/6	extract [4] 206/14
123/3 123/19	expanded [1] 83/20	207/12 214/5
124/20 125/16	expansions [1]	215/22
126/12 127/16	83/23	extracted [2]
128/7 128/18 129/5	expect [2] 27/12	210/24 216/9
130/10 131/22	186/24	extracting [1]
132/14 132/25	expected [2] 27/9	207/9
133/13 134/16	51/21	extremely [1] 49/7
135/10 137/13	expended [1] 26/22	
138/9 138/20 140/4	expenditure [2]	F
140/17 141/4	25/20 26/17	fabrication [2]
141/23 142/12	expense [2] 15/18	8/24 10/25
143/10 143/11	17/10	face [3] 62/4 62/4
144/14 145/14	expert [2] 116/17	104/16
147/6 147/21	157/6	facing [3] 83/11
148/14 149/17	expertise [2]	85/11 85/14
151/3 162/7 162/14	203/21 203/22	fact [17] 8/25
163/21 164/7	experts [1] 209/4	11/5 33/18 79/5
164/19 166/10	expires [1] 110/19	82/14 96/18 108/24
168/3 168/17	explain [2] 7/23	154/5 156/2 156/17
169/18 170/9	212/4	157/17 167/1
170/17 171/13	explained [3] 95/3	194/11 198/15
172/22 174/6	133/19 179/19	209/5 212/9 214/23
177/21 181/7	explaining [3]	fail [3] 51/21
184/25 188/23	91/5 157/5 197/5	51/24 93/11
190/10 209/12	explanation [2]	failed [2] 7/22
209/19 210/8	41/4 43/12	93/9
211/10 211/24	expletive [2]	failure [1] 80/10
215/1 215/10	136/23 136/24	failures [1] 93/8

F	108/11 214/9	figure [1] 79/16
USCA11 Case: 22-11150 Document: 53-11 Date Filed: 11/30/22 Page: 232 of 254	214/11 216/12	file [7] 6/25/7/1
fair [1] 60/19	216/13 218/1	110/7 110/13
fairly [1] 47/17	February 11th [2]	167/13 170/25
fake [10] 186/9	11/15 11/24	194/5
186/20 186/21	February 14th [1]	filed [4] 164/25
187/5 187/6 189/21	12/22	165/3 194/2 221/8
190/16 190/16	February 18th [1]	files [1] 13/1
190/17 191/3	17/25	filing [6] 104/16
fall [2] 93/4	February 27th [1]	110/4 110/9 114/5
198/11	216/12	165/12 194/2
fallacia [1] 175/2	February 28th [4]	filings [2] 9/1
fallacious [1]	214/9 214/11	127/8
184/10	216/13 218/1	final [9] 19/3
fallacy [1] 175/3	February 6th [2]	35/7 68/2 72/22
false [2] 29/8	10/15 10/21	73/25 99/25 154/12
175/5	February of [2]	154/14 158/9
falsifiable [1]	12/7 12/14	finally [6] 12/13
175/1	federally [1]	14/11 79/17 99/10
familiar [5] 17/15	204/16	186/18 208/10
140/22 145/9 148/9	feel [3] 18/2	finance [2] 62/12
164/1	74/16 201/13	66/5
family [6] 40/25	feeling [2] 57/20	financial [2]
85/19 95/9 210/6	57/21	25/11 177/6
217/11 218/15	fees [2] 12/12	find [12] 6/22 7/3
far [3] 33/11 35/1	15/25	11/9 21/13 31/13
100/12	fell [1] 177/2	58/14 78/23 80/19
Farnworth [1]	FERNANDEZ [2] 1/21	96/20 110/23
125/9	5/6	175/24 199/14
farther [2] 189/5	few [5] 133/4	finding [1] 57/25
189/8	171/4 219/8 219/19	findings [2]
fashioned [2]	219/19	206/23 206/24
43/17 90/14	fiancee [1] 9/1	Fine [1] 160/18
fast [1] 54/4	Fibonacci [1]	finger [1] 36/18
father [1] 23/16	55/17	fingers [1] 56/25
favor [1] 14/8	field [5] 152/12	finish [3] 16/7
FBI [3] 204/25	159/6 160/8 166/17	34/5 158/8
205/3 206/1	203/21	fired [3] 38/7
FBI's [2] 204/18	fifth [1] 209/24	191/20 191/21
205/4	fight [6] 8/19 9/2	firm [6] 15/17
February [15]	9/4 12/6 14/10	26/20 91/18 92/3
10/15 10/21 11/15	15/24	94/13 203/17
11/24 12/7 12/14	fighting [2] 15/25	firms [1] 58/9
12/22 17/25 108/10	82/19	first [51] 8/18

F	1/14 1/18 1/22	forgery [20]
USCA11 Case: 22-11150 Document: 53-1 Date Filed: 11/30/22 Page: 236 of 254	1/25 224/3 224/7	155/25 158/10
first... [50] 9/3	224/15 224/18	158/12 185/24
13/4 13/8 14/20	flow [1] 48/19	185/25 209/2 210/9
18/1 19/17 19/19	flsd.uscourts.gov	210/12 212/9 212/9
21/6 22/20 26/1	[2] 1/25 224/19	213/4 214/10
32/12 36/1 41/15	flub [1] 176/20	214/23 214/23
41/16 45/5 46/12	fluctuations [1]	215/23 217/15
47/21 62/7 66/8	102/4	218/1 218/24 219/2
76/13 86/14 87/4	flying [3] 81/2	219/23
87/19 89/8 94/1	81/14 82/3	forging [1] 38/7
94/22 97/21 104/3	focus [3] 96/6	forgotten [2] 47/4
104/13 107/21	154/9 204/7	55/2
119/1 119/4 137/23	focused [2] 204/9	form [5] 7/9 82/1
143/14 144/6	205/23	157/21 167/15
144/13 169/1	follow [1] 175/5	197/12
179/11 180/2 181/3	followed [3] 67/4	formally [1] 77/11
193/16 194/9	67/8 68/22	format [2] 157/20
194/11 194/13	following [5] 10/9	157/22
194/16 194/16	12/8 13/5 31/5	formed [1] 175/14
200/21 201/8	104/10	former [3] 29/17
212/11 218/14	force [6] 84/5	45/20 64/4
five [12] 11/18	84/14 86/19 86/22	forms [1] 34/21
12/1 18/18 18/22	196/8 197/15	formulate [1] 39/2
24/17 27/1 68/23	forego [2] 85/20	formulating [1]
86/15 103/15	91/10	201/25
103/15 108/21	foregoing [1]	forth [2] 64/1
192/23	224/10	221/23
fixed [6] 26/11	forensic [3]	fortune [1] 222/5
26/17 26/21 43/15	203/22 206/12	forward [8] 32/13
219/17 219/19	206/14	74/24 86/12 106/17
flag [11] 96/2	forge [11] 145/18	155/21 159/17
96/3 96/14 96/22	147/10 148/1	202/12 206/18
97/1 97/4 97/4	148/16 148/20	forwarded [16]
97/5 97/8 97/21	149/19 149/23	32/24 33/16 34/7
221/13	150/3 150/6 151/5	34/9 61/17 99/14
flagged [4] 96/14	186/4	99/16 104/18
97/21 97/25 222/4	forged [10] 148/17	127/20 139/15
flagging [1] 96/18	148/19 149/3	150/19 158/25
FLEXNER [1] 1/15	149/20 150/8	159/17 164/13
flick [1] 56/25	150/13 151/6 157/7	195/15 217/23
floated [1] 24/3	157/16 186/3	forwarding [8]
floating [1] 134/8	forgeries [3]	69/14 69/19 126/6
FLORIDA [9] 1/1	209/5 220/3 220/5	127/5 129/23

F	176/24	funky [1] 149/11
forwarding... [3]	founding [1] 36/14	funny [1] 40/18
140/10 140/12	four [7] 17/25	further [7] 20/8
150/20	43/19 52/15 56/10	41/18 97/17 201/18
forwards [4] 90/18	57/7 108/13 192/23	221/3 222/14
136/3 136/11	fourth [2] 183/14	224/12
219/20	188/22	future [2] 55/23
fought [2] 14/5	frankly [1] 99/22	174/10
17/7	fraudulently [1]	FYI [1] 74/25
found [7] 21/8	118/11	G
40/19 113/8 146/9	free [2] 51/25	G-N-U-P-G [1]
180/14 216/18	101/7	213/21
219/5	FREEDMAN [17] 1/12	GAAR [5] 11/3 11/4
foundation [39]	1/13 2/5 4/10 6/14	11/6 11/7 188/15
14/24 15/5 94/5	7/13 10/18 98/22	Gables [1] 1/22
94/7 103/9 103/22	110/25 112/8	gain [1] 17/13
120/11 121/1	112/22 153/1 154/4	gains [1] 20/1
122/24 123/15	168/17 183/18	gamble [1] 102/3
124/16 125/13	192/24 215/9	gambling [1] 102/6
129/18 129/20	freely [1] 157/5	games [2] 55/25
131/5 132/11	freeze [1] 177/5	124/7
133/18 139/22	friend [1] 79/20	gaming [2] 59/3
139/25 143/11	friendly [1] 90/10	59/6
143/24 144/11	front [6] 48/20	gaps [1] 112/2
147/2 149/14	60/20 151/13	gateway [1] 156/15
151/14 152/20	156/16 157/10	gave [4] 34/8
152/22 152/25	165/12	37/24 43/7 51/20
154/2 156/10	frozen [1] 168/8	general [4] 146/22
156/19 157/9	FTI [1] 206/10	173/22 188/15
158/15 161/25	full [9] 8/7 13/14	206/24
162/10 167/8	66/5 70/5 78/7	generally [2]
183/20 192/14	116/6 146/21 213/9	171/8 207/8
192/17	213/10	gentlemen [8] 6/3
foundations [1]	fully [3] 27/2	60/4 61/8 111/4
199/15	89/15 126/4	112/16 163/10
founded [5] 26/1	fund [2] 82/7	201/23 220/13
39/8 104/22 175/19	82/12	Germany [1] 53/6
176/17	fundamental [1]	get [73] 4/4 5/21
founder [4] 23/17	54/5	6/6 10/7 13/11
23/20 24/10 24/16	funded [4] 40/2	13/13 14/10 15/23
founder's [1]	58/6 182/14 204/16	19/3 21/6 21/15
82/15	funding [5] 41/12	24/1 25/4 26/19
founders [2] 42/19	41/14 41/18 141/8	36/15 41/18 44/2
	196/21	

G	110/19 165/2 188/1	143/19 144/5 144/6
get... [56]	195/14	156/23 157/19
48/22 49/16 49/22	gives [1] 95/5	162/20 165/20
49/24 51/24 58/10	global [5] 92/24	175/20 175/21
59/8 59/23 61/19	100/11 141/9 177/3	176/5 180/17
62/20 64/3 68/12	177/6	182/19 183/13
68/25 74/19 77/13	globally [1] 200/6	186/15 186/16
78/13 78/14 79/6	Gmail [3] 29/3	189/11 189/18
79/7 79/9 79/23	155/9 155/12	190/23 190/25
80/19 81/12 82/1	gmail.com [1]	202/21 211/25
84/15 89/8 89/12	28/24	212/25 213/22
89/13 90/7 100/25	Gnu [1] 213/21	214/25 216/5 216/5
110/15 112/17	GnuPG [4] 213/19	216/21 217/18
133/17 134/10	214/2 214/5 215/21	218/18 220/10
135/1 136/16	go [112] 4/4 5/19	220/11 221/6
136/19 136/19	5/25 9/7 9/24	God [1] 191/2
157/7 165/7 167/17	12/18 16/3 16/8	goes [6] 33/4
171/25 175/11	16/12 16/15 18/22	118/13 135/5 148/2
176/9 180/4 182/2	20/12 21/22 27/17	162/8 195/20
184/19 186/7	28/2 28/19 28/20	going [67] 6/15
190/13 190/14	32/5 32/11 33/5	6/20 8/9 11/2 18/7
194/24 200/3 200/5	36/7 37/8 38/4	35/2 35/7 39/18
207/4 207/15	38/18 38/19 40/8	40/18 64/1 69/4
gets [6] 77/12	46/4 49/3 49/4	79/4 80/18 82/18
110/17 154/8 156/6	49/23 54/18 55/19	82/20 82/21 89/10
156/8 196/5	56/3 57/2 57/12	90/17 90/17 93/3
getting [5] 10/9	58/11 60/6 62/25	93/7 95/7 96/22
47/12 77/24 86/20	65/2 67/13 68/4	100/25 102/5 102/6
176/12	70/13 72/14 72/21	102/8 109/7 109/24
give [35] 8/13	76/24 78/8 78/23	110/1 111/13
8/22 21/17 33/5	88/20 89/9 89/11	112/10 118/10
36/5 36/6 37/1	92/7 93/15 94/19	118/21 118/22
37/24 59/13 59/16	95/23 96/25 97/2	121/14 122/1
59/17 59/19 66/4	100/21 103/10	125/20 133/15
70/4 76/22 77/14	103/18 106/16	134/10 157/7
77/16 77/18 77/19	106/24 107/17	167/13 167/14
77/20 84/8 91/9	110/9 110/22	173/10 176/11
110/16 131/16	111/11 112/8	183/17 187/13
134/7 144/21 168/9	112/12 114/13	190/24 190/24
170/3 176/8 176/13	119/1 119/4 119/6	191/13 191/25
197/4 202/1 202/19	119/13 120/5 121/3	192/1 192/17 197/4
222/5 222/10	121/19 121/23	198/11 198/11
given [5] 60/19	136/22 136/23	204/20 207/20
	136/24 143/14	208/22 209/1

<p>G</p> <p>going... [7] 210/11 210/11 215/17 220/3 220/13 222/5 222/21</p> <p>gold [5] 43/11 43/12 43/16 90/15 196/20</p> <p>Goldstein [1] 52/1</p> <p>gone [5] 7/10 76/21 115/3 161/7 182/5</p> <p>Gonzalez [1] 5/8</p> <p>good [36] 4/2 4/2 4/9 4/11 4/12 4/14 4/16 4/19 4/22 4/23 4/25 5/2 5/5 5/10 5/11 6/3 6/5 6/13 6/14 13/10 33/4 48/23 56/23 60/1 77/20 104/20 106/20 108/15 111/1 112/21 112/22 136/2 195/5 202/11 203/5 222/25</p> <p>goods [2] 14/12 26/24</p> <p>Google [3] 155/9 155/16 166/1</p> <p>gosh [1] 190/14</p> <p>got [33] 8/18 22/24 23/7 24/20 27/7 29/2 29/15 35/7 51/22 51/25 55/21 55/22 56/22 56/23 69/2 74/7 83/14 84/23 84/25 108/11 111/11 147/25 154/12 157/6 157/8 161/3 185/2 187/11</p>	<p>189/16 191/21 191/22 195/17 216/24</p> <p>gotten [1] 180/1</p> <p>government [9] 14/4 14/11 14/17 19/24 21/6 48/16 54/14 90/21 204/17</p> <p>governments [1] 48/24</p> <p>Gox [2] 83/21 83/25</p> <p>GPU [4] 180/11 180/11 180/15 180/15</p> <p>grab [2] 112/10 163/3</p> <p>graduate [1] 204/12</p> <p>grant [1] 68/8</p> <p>granted [1] 110/16</p> <p>graph [1] 55/15</p> <p>graphics [1] 55/5</p> <p>great [4] 49/14 79/6 162/17 221/11</p> <p>green [1] 109/2</p> <p>grew [1] 77/17</p> <p>Greyfog [4] 40/3 41/10 43/5 88/14</p> <p>grounds [3] 63/17 103/19 144/9</p> <p>group [25] 41/1 51/4 58/15 62/13 64/18 64/24 73/14 78/25 81/1 83/6 87/8 94/14 94/15 94/25 96/5 96/6 96/10 97/13 97/19 100/7 100/8 104/9 123/23 141/8 203/18</p> <p>group's [1] 195/2</p> <p>grovel [1] 93/10</p> <p>grow [4] 57/15</p>	<p>57/16 57/20 80/5 7/1 7/23 9/2 9/4 12/4 12/8 13/23 13/24 14/8 15/18 19/12 20/1 21/11 48/12 48/13 48/14 86/20</p> <p>guess [3] 82/24 83/1 180/24</p> <p>guesstimated [1] 180/23</p> <p>gutter [1] 60/10</p> <p>guy [3] 37/22 81/24 82/5</p> <p>guys [3] 43/23 70/3 70/4</p> <hr/> <p>H</p> <p>habit [3] 135/1 136/12 136/16</p> <p>hacked [3] 191/16 191/17 191/19</p> <p>hacker [2] 192/3 192/4</p> <p>had [148] 4/3 6/6 8/16 8/18 9/3 12/6 12/24 13/14 14/10 15/16 15/17 15/24 16/25 17/8 17/10 18/8 20/25 21/2 23/23 23/25 24/5 26/4 28/13 31/24 34/18 34/20 36/3 36/6 36/12 38/15 40/5 42/13 42/18 42/19 42/25 43/2 43/3 43/18 44/1 44/11 45/9 47/8 47/9 48/6 48/16 49/15 49/17 49/18 49/25 50/11 51/13 54/8 54/12 55/7 55/8 55/12 55/13 57/13 57/17 59/1</p>
--	--	--

H	half-million [1]	186/2 186/4 186/21
USCA11 Case: 22-11150 Document: 53-11 Date Filed: 11/30/22 Page: 240 of 254	68/23	harder [2] 53/22
had... [88] 59/7	half-million-dollar [1] 8/11	90/12
59/18 59/25 64/8	halfway [2] 95/16	hardest [1] 90/10
64/21 67/7 72/3	173/18	hardware [1] 53/4
73/6 73/15 75/13	hand [33] 13/5	Hardy [1] 140/23
75/15 75/15 77/6	19/5 23/1 23/4	Harvard [1] 108/19
77/10 77/16 78/1	35/15 40/11 47/16	has [58] 6/23 7/4
78/7 78/17 78/25	49/2 72/11 72/12	10/25 30/14 30/21
80/10 81/3 83/13	72/15 88/18 124/10	35/8 35/16 35/17
83/21 83/22 84/1	155/14 155/15	36/6 36/17 40/24
84/4 84/25 90/3	155/24 156/1 158/5	46/18 49/19 57/6
90/6 90/15 98/1	158/9 158/21	57/8 60/8 60/9
99/12 99/13 106/3	159/15 159/19	60/10 80/24 82/14
106/5 110/15	161/18 161/19	85/2 87/15 87/19
112/16 113/16	165/7 166/24	87/20 94/25 97/6
116/25 126/23	166/24 185/7	102/4 108/9 115/3
131/9 134/9 134/10	185/14 201/25	117/11 117/11
136/5 140/12 142/6	202/3 202/12	117/11 121/23
145/24 146/9	224/14	121/25 122/2
146/10 146/14	handed [3] 153/20	143/11 155/16
146/15 146/17	165/8 165/11	156/7 156/10
146/19 146/20	handle [4] 28/8	157/10 157/17
146/21 146/22	43/22 43/24 51/15	158/16 161/13
149/9 153/23	happen [5] 68/14	162/6 162/11 175/4
162/10 164/2	86/2 196/15 196/24	175/22 180/7
172/11 172/11	198/10	182/23 184/6
175/14 175/18	happened [11] 8/8	185/17 185/18
176/19 176/22	11/6 18/23 29/6	186/1 188/10 194/3
178/11 179/23	38/12 39/19 82/7	194/5 213/9 222/6
179/24 179/25	165/4 177/3 187/11	hash [2] 180/8
182/1 182/3 182/7	192/2	180/8
182/7 182/7 182/8	happening [1] 82/9	hasn't [2] 115/4
187/9 187/19	happens [4] 57/1	208/17
191/18 191/19	83/5 117/10 165/1	hate [2] 58/2
194/23 196/15	happy [5] 5/11	169/22
199/22 199/23	51/11 51/19 133/15	hates [1] 135/1
211/7 214/16	187/15	have [229]
214/20 224/8	hard [14] 36/18	haven't [12] 27/2
hadn't [1] 78/5	44/19 55/11 79/2	33/17 56/13 100/12
half [10] 8/3 8/11	79/8 79/13 89/8	101/23 114/7
8/20 8/20 21/3	90/20 138/13	114/22 114/24
21/18 52/21 53/10	138/14 138/15	115/5 158/15
68/23 212/15		187/14 209/9

H	135/16 140/12	hearsay [35] 15/5
USCA11 Case: 22-11150 Document: 53-11 Date Filed: 10/30/22 Page: 241 of 254	154/3 157/7 157/10 44/17 44/20 50/22	44/17 44/20 50/22
having [12] 8/11	157/19 158/12	61/23 63/16 63/17
44/19 45/22 54/9	161/13 162/6	65/16 69/22 71/9
54/13 133/25	172/16 174/14	81/18 87/1 94/7
146/11 150/3 157/4	174/15 174/16	98/17 103/8 103/19
168/7 177/7 178/10	174/16 174/18	107/14 116/17
he [149] 10/6	174/19 175/11	119/20 120/11
12/24 12/25 13/4	175/16 178/4 178/6	121/2 123/1 123/15
13/15 18/9 23/7	178/7 178/21	124/16 125/12
23/8 23/23 23/24	178/23 178/24	129/17 131/4
24/1 24/4 24/5	179/1 179/13	139/23 139/25
24/7 27/8 27/8	179/14 180/14	143/1 143/25
32/17 33/6 34/22	180/22 181/24	144/11 147/3
35/8 35/9 35/10	182/8 187/12	149/15 152/21
37/17 37/18 37/19	187/14 196/23	heart [1] 76/13
37/23 38/8 39/9	199/22 199/23	held [6] 10/23
39/9 39/10 39/10	200/13 211/17	48/18 88/5 101/18
39/10 44/11 48/15	212/22 218/14	108/6 153/22
49/16 57/13 57/22	222/5 222/6	Hello [4] 11/20
57/22 57/22 59/11	he'd [1] 49/24	33/4 51/2 62/4
59/11 59/15 59/17	he's [27] 8/3 8/4	help [12] 36/23
59/19 59/22 64/9	8/17 8/23 9/3 10/5	37/14 37/14 38/21
73/15 73/16 74/2	11/5 13/22 17/5	39/9 69/15 80/18
75/2 75/23 76/20	21/1 35/7 35/8	95/17 105/25
76/21 77/4 77/4	35/9 52/14 57/1	138/25 139/11
77/4 77/6 77/6	57/22 64/22 79/22	167/1
77/9 77/9 77/10	156/6 157/1 175/16	helped [9] 47/13
77/11 77/12 77/23	180/13 187/15	54/17 56/1 79/20
78/3 78/8 78/8	191/25 199/5	174/18 174/19
78/9 78/9 78/22	200/12 201/1	178/21 180/14
78/23 78/24 78/24	header [2] 142/5	180/15
79/11 79/12 79/12	154/19	helpful [1] 221/18
80/3 80/4 80/4	healthy [2] 5/12	helping [1] 178/6
80/5 80/6 80/6	6/5	hence [1] 10/9
80/6 80/7 80/10	hear [7] 9/17 9/21	her [4] 135/5
80/21 80/23 80/24	143/9 148/25	135/24 135/25
81/2 82/2 82/5	165/15 211/16	142/7
88/13 93/11 103/22	211/18	here [34] 4/20
104/9 106/6 106/7	heard [4] 92/13	4/21 5/12 7/22 8/5
115/21 115/21	187/15 205/6	11/8 11/9 14/7
121/22 121/24	207/13	35/24 46/24 51/2
122/2 127/9 129/24	hearing [2] 44/19	67/19 77/1 80/14
134/6 134/7 134/7	146/12	80/15 86/17 94/24

H	34/11 35/2 36/22	7/10
USCA11 Case: 22-11150 Document: 53-1 Date Filed: 11/30/22 Page: 142 of 254	36/23 39/9 39/11	holidays [1] 24/24
here... [17] 111/5	47/7 59/18 78/3	home [2] 34/19
111/19 111/19	80/21 80/22 80/24	55/6
112/3 117/12	82/1 127/8 127/11	homeless [1]
168/15 172/7 181/1	146/12 146/21	199/21
187/16 194/23	178/3 182/2 182/24	honest [2] 37/25
199/1 210/11 212/6	191/10 191/25	198/21
212/22 215/9 220/9	himself [2] 217/16	honesty [1] 8/24
220/15	219/1	Honor [247]
here's [2] 78/10	hire [2] 57/15	HONORABLE [1] 1/10
185/11	78/24	hope [4] 4/3 6/5
hereby [2] 101/5	hired [1] 178/17	62/6 111/18
224/7	his [36] 8/25 18/1	hoped [2] 101/22
hereunto [1]	18/12 23/7 34/19	182/7
224/14	34/20 36/18 36/18	horrendously [1]
hernandez [6] 1/23	39/8 39/10 49/16	13/6
1/25 224/5 224/17	52/2 59/5 82/1	horrible [2] 79/2
224/17 224/19	95/8 123/23 124/25	79/5
Hernando [1] 200/2	127/5 128/22	hospital [1]
hers [1] 124/12	140/11 145/9 154/6	179/17
Hi [5] 4/11 10/7	156/7 157/2 157/17	hosted [6] 155/9
28/5 32/17 99/9	157/18 161/20	205/19 205/21
highlight [20]	166/5 175/15	205/24 206/1 206/3
20/4 23/12 24/8	180/13 180/20	hotel [1] 191/24
24/11 30/8 40/21	194/5 198/9 200/24	Hotwire [21] 41/2
66/8 66/10 68/15	207/21 222/5	41/21 46/2 46/7
72/15 92/10 95/24	history [2] 12/6	47/1 52/15 83/10
114/25 161/19	133/7	83/12 84/16 85/25
173/17 177/22	hit [1] 83/17	86/1 86/8 86/9
185/3 190/3 192/22	Hmm [1] 152/2	86/22 87/9 87/10
193/2	hobby [2] 196/22	87/15 87/19 87/20
highlighted [8]	196/25	88/5 100/1
67/17 86/17 117/17	hold [10] 9/14	hotwirepe.com [2]
131/13 161/3	28/20 31/21 80/3	171/1 217/24
209/22 209/25	80/4 99/9 106/17	hour [5] 111/5
219/8	112/1 165/7 184/12	203/13 216/16
highlighting [1]	holdings [12]	216/18 219/6
159/24	70/18 71/16 72/6	housekeeping [1]
highly [3] 50/5	100/19 120/17	163/12
50/18 55/8	193/9 193/15 194/6	how [48] 8/16
him [29] 12/23	194/14 194/15	12/16 15/19 19/13
18/1 18/1 24/4	194/16 194/18	19/24 19/25 23/23
24/5 24/6 27/12	holiday [2] 6/6	26/9 26/13 26/15

H	133/18 136/23	159/9 159/24
how... [38] 28/22	154/20 177/16	167/13 170/24
28/8 28/13 29/2	190/22 195/14	172/9 172/10
29/5 29/15 37/20	206/18 222/2	173/16 174/24
43/1 45/23 48/25	222/10	176/10 176/11
57/17 59/16 59/16	I'll [17] 37/19	180/13 183/19
76/25 80/21 84/18	59/13 59/19 67/18	186/7 189/23 190/1
93/8 93/8 103/14	78/20 81/5 84/11	192/16 198/22
110/10 110/18	93/9 93/10 93/12	203/19 204/20
111/8 117/5 161/1	111/5 112/3 135/3	207/20 211/17
173/23 178/22	136/19 199/9	218/4
180/8 180/18	219/15 222/22	I've [38] 15/22
180/21 191/23	I'm [102] 5/11	36/25 37/1 40/14
191/24 207/4 212/8	10/24 11/6 11/9	49/13 56/10 56/22
213/12 213/13	11/9 13/9 13/9	69/2 80/9 84/25
213/25 216/14	21/4 28/7 32/22	91/5 92/13 95/6
219/4	37/21 39/18 40/20	101/11 101/21
However [1] 96/8	44/18 44/19 47/12	102/1 104/22 106/2
huge [1] 48/22	58/1 58/2 61/2	108/9 108/11
huh [1] 160/1	63/25 70/3 73/16	108/15 111/11
human [1] 207/19	74/17 76/23 79/2	113/17 116/25
hundred [20] 36/11	80/13 80/18 80/19	146/5 146/7 149/20
43/21 49/19 54/10	80/21 80/22 92/13	153/24 174/19
54/14 56/12 56/14	92/15 92/15 92/17	182/3 182/6 186/15
56/21 56/24 59/10	92/17 92/19 93/3	191/22 193/17
59/13 59/16 59/20	93/4 93/4 93/7	195/17 197/5
59/22 64/23 135/3	95/3 95/4 95/4	198/25 199/4
135/5 176/8 191/4	95/6 95/7 95/7	Icelandic [1]
197/3	95/16 101/14	206/2
hundred-billion-dol	101/15 101/16	ID [9] 46/8 46/18
lar [2] 54/10	101/23 101/24	46/24 47/1 47/11
54/14	102/5 102/5 102/8	49/3 49/8 49/9
hundreds [7] 29/3	106/9 108/17	52/14
29/4 29/7 29/7	108/17 108/20	idea [14] 18/8
29/8 80/11 80/11	108/21 111/17	19/25 49/14 75/16
hurdles [1] 93/2	112/1 112/10	80/24 105/9 105/13
Hyde [2] 199/21	116/15 118/21	113/16 114/22
199/23	118/21 121/14	115/5 145/17
I	125/19 125/20	193/17 195/14
I'd [19] 29/1	129/10 133/15	199/7
38/16 39/18 47/4	136/18 139/12	identical [3]
52/3 55/2 58/25	139/24 143/9	156/5 156/8 218/2
59/5 84/16 120/23	146/11 146/23	identified [4]
	151/11 152/4 159/1	67/24 97/5 101/9

I	imply [1] 16/2	incorporated [2]
USCA11 Case: 22-11150 Document: 33-1 Date Filed: 11/30/22 Page: 244 of 254	implying [2] 91/4	incorporation [2]
identified... [1]	113/5	68/7 72/16
157/18	importance [2]	incorrect [4] 91/4
identify [5] 95/18	97/7 97/12	100/3 113/6 179/17
96/4 205/23 206/14	important [1]	incredibly [1]
212/16	155/20	51/9
identities [1]	impossible [2]	independent [1]
29/8	205/19 205/21	220/20
ignore [1] 82/1	impressed [1]	India [2] 199/13
ignores [3] 8/25	37/21	199/16
9/1 9/2	improper [10] 7/5	indicate [2]
ignoring [1] 12/5	115/15 115/21	214/22 217/7
II [1] 46/18	116/13 116/15	indicates [4] 96/8
illegal [2] 77/3	116/16 192/15	96/12 154/25 214/8
205/11	193/3 197/22	indicia [2] 154/2
image [2] 172/18	200/25	158/16
174/3	inappropriate [2]	individual [2]
imaged [1] 165/4	60/12 222/6	106/20 214/18
imagine [9] 14/2	Incident [1]	individuals [3]
37/25 55/10 56/22	203/19	109/19 133/4
57/1 59/11 77/22	incidents [1]	214/19
85/5 90/12	191/20	industrial [1]
imagined [1] 177/3	include [3] 149/25	49/7
immediately [1]	150/10 218/2	industries [1]
68/8	included [6]	89/12
immensely [1]	153/21 153/22	infinite [1] 43/15
54/15	153/23 165/2 170/2	inflation [1]
immutably [1]	207/8	90/19
200/1	includes [2] 214/8	Info [6] 1/4 21/25
impeachment [10]	215/7	22/3 30/24 40/25
115/13 115/15	including [21]	89/17
115/19 115/21	24/23 44/8 45/4	information [19]
116/18 117/15	100/1 101/7 101/19	10/11 20/8 24/12
181/7 200/24 201/1	116/23 116/24	31/5 38/13 40/1
201/3	116/24 117/8	43/5 46/2 46/7
impinged [1] 117/3	118/11 129/9 133/4	75/23 127/7 146/16
implement [2]	149/3 150/12 151/6	152/2 160/11
174/16 174/17	156/12 188/2	175/15 187/23
implementation [3]	191/23 196/11	194/4 208/4 214/5
70/15 71/15 174/14	217/5	infrastructure [1]
implemented [2]	incomplete [5]	205/24
174/15 174/16	153/7 153/8 153/8	inherited [1] 39/8
implied [1] 101/12	153/10 153/12	

I	112/23 113/1 113/9	inventing [1] 58/3
Initial [4] 62/7	114/20 115/3 115/8	invest [1] 61/19
66/2 66/21 69/4	116/7 116/9 117/1	invested [3] 25/23
initially [3] 43/6	117/2 117/14	54/12 58/11
51/19 217/13	118/14 124/24	investigated [2]
injected [1] 222/6	125/8 134/2 187/24	13/23 114/24
input [3] 7/25	intelligence [4]	investigation [3]
20/25 42/18	55/15 86/9 87/10	11/3 205/25 206/14
inquiries [1]	87/15	investigations [5]
30/13	intend [1] 92/19	95/17 203/18
Inside [1] 69/19	interact [1] 200/6	203/22 205/13
insignificant [1]	interaction [1]	205/17
180/20	64/8	investment [7]
instance [5] 15/16	Interconnected [1]	58/15 58/24 61/15
19/9 27/1 101/14	109/17	62/5 62/8 62/12
213/16	interest [3] 43/14	82/6
instances [1]	43/14 101/7	Investments [4]
208/5	interested [2]	195/10 195/11
instead [2] 50/3	29/9 172/15	195/19 195/22
135/4	interesting [2]	investor [3] 41/21
Institute [3]	47/3 82/23	76/16 134/5
204/2 204/4 204/5	interestingly [1]	investors [5] 41/8
instructed [2]	82/5	41/10 57/25 78/23
178/17 178/23	interests [1]	93/10
integrating [1]	76/13	invoice [1] 17/12
51/4	interfered [2]	involve [1] 73/17
Integryrs [1] 127/7	36/12 49/15	involved [9] 12/23
intel [1] 180/17	interim [1] 167/17	59/8 61/18 94/17
intellectual [58]	internal [1] 17/1	105/13 151/11
25/13 25/16 35/17	internally [1]	182/2 205/13
36/5 40/24 42/25	222/11	205/14
49/25 64/19 65/9	international [6]	involvement [2]
72/4 73/13 75/7	48/12 91/18 195/10	74/20 138/25
78/3 78/18 81/25	195/11 195/18	involves [1] 70/16
82/23 83/2 88/5	195/22	involving [3]
88/8 88/10 88/24	Internet [1]	47/11 206/6 206/8
89/1 89/3 89/18	144/25	IP [30] 39/24
94/15 95/18 96/4	interrupted [1]	49/11 62/20 63/4
96/7 96/9 96/21	34/4	64/2 67/22 67/25
97/8 97/11 97/15	interruption [3]	67/25 68/12 68/24
97/15 99/25 100/5	189/24 202/18	73/25 82/8 82/13
101/6 101/8 101/18	213/20	82/16 82/21 83/7
101/19 110/4 110/5	introduce [3]	86/1 86/14 87/8
	144/2 161/14 203/5	88/6 88/14 89/17

I	isn't [31] 21/9	77/1 77/3 78/15
USCA11 Case: 22-11150 Document: 53-11 Date Filed: 11/30/2022 Page: 248 of 258	27/7 27/11 33/14	79/13 87/9 90/18
IP... [8] 90/5	34/10 35/22 42/12	92/14 93/22 98/21
91/3 100/17 101/9	45/14 49/12 65/11	99/3 100/15 104/18
101/20 104/11	68/2 73/3 81/3	110/8 110/10
113/21 120/3	82/17 89/4 100/2	110/11 110/23
IPO [1] 49/23	102/2 102/2 110/5	113/3 113/3 117/20
IRA [72] 1/3 4/7	113/13 114/15	117/20 117/21
12/22 17/23 17/25	115/8 116/12	118/7 118/8 119/17
18/7 18/8 18/11	136/25 155/6 184/7	119/17 123/17
18/12 23/5 23/18	187/4 192/3 196/7	124/9 124/18 125/7
24/9 24/15 26/2	197/21 201/13	125/14 126/5
27/7 27/10 27/13	issue [15] 42/16	128/22 129/12
27/19 28/4 30/6	86/21 96/14 96/15	131/7 132/4 136/4
32/15 33/4 34/3	97/1 97/4 97/6	138/14 145/9
34/10 36/21 39/2	97/9 97/21 115/18	150/22 151/25
39/6 39/20 48/1	155/20 163/21	152/2 152/3 152/12
48/5 57/12 57/12	168/7 178/23	153/5 153/7 154/7
64/9 73/2 73/5	187/13	154/8 155/17
73/12 73/15 74/1	issued [3] 9/12	155/20 157/20
74/8 74/16 75/22	68/8 187/25	158/4 159/12
76/4 76/12 78/1	issuer [2] 117/9	159/17 160/5 161/1
78/16 79/14 81/2	118/5	161/12 162/12
81/13 81/14 81/24	issues [8] 12/8	165/11 166/4
82/14 98/6 98/12	61/18 86/1 86/15	170/16 173/8
98/17 99/8 99/15	86/23 87/22 96/3	173/18 176/4 176/4
99/23 127/5 134/6	97/4	176/11 178/13
134/10 140/8	issuing [1] 187/10	181/11 182/5
150/18 155/4	it [511]	182/18 183/1
164/12 164/13	it's [141] 4/2 8/2	183/21 184/13
217/24 217/25	8/3 8/21 11/8 11/9	184/19 185/13
218/16 218/25	13/6 13/10 14/5	185/13 185/22
219/2 219/10	14/18 15/7 17/20	186/2 186/3 186/4
219/20	21/6 23/14 23/20	186/8 186/17
Ira's [1] 38/24	24/19 25/1 26/17	186/21 192/15
ironically [1]	30/5 31/12 34/25	192/18 192/25
57/11	35/9 37/3 37/4	195/1 195/1 195/8
irregularities [1]	43/11 43/11 43/12	195/24 196/25
89/10	44/9 45/21 45/24	197/1 198/11 208/3
irreversible [1]	47/3 48/19 52/17	213/6 220/7 221/16
199/12	52/18 56/16 57/17	Italia [1] 140/21
IRS [1] 196/16	57/21 57/21 66/2	italics [1] 88/8
is [550]	67/18 69/11 69/13	item [2] 222/1
Islamic [1] 43/13	73/9 73/21 74/18	222/2

I USCA11 Case: 22-11150 Document: 53-1 Date Filed: 6/30/22 Page: 242 of 254 Items [1] 101/8 its [8] 25/16 35/22 78/18 156/24 157/19 162/9 205/23 206/17 itself [2] 29/22 219/14	6/1 jury: [52] 1/11 6/12 9/8 17/20 26/22 60/5 60/20 61/5 61/6 94/12 111/6 112/13 112/14 115/24 135/11 138/22 139/3 141/5 156/16 157/10 159/7 159/21 162/22 163/2 163/6 163/8 163/10 170/20 174/7 181/20 186/24 190/11 200/16 201/6 201/9 203/6 203/15 203/24 205/2 205/16 206/23 207/5 207/16 208/1 208/11 210/14 211/8 212/1 213/4 213/25 220/22 220/25	125/20 130/1 130/17 135/24 143/2 154/17 157/5 157/11 160/22 160/23 161/7 161/10 161/13 161/18 161/20 162/16 163/3 163/18 165/10 166/23 169/11 169/21 170/3 170/14 170/18 171/16 171/20 171/22 173/9 175/24 176/8 180/3 183/19 184/14 188/24 189/14 192/7 192/13 201/1 201/24 204/20 207/20 207/22 210/1 210/22 213/9 219/19 221/12 222/10 222/10
J January [5] 7/3 7/20 9/12 9/15 41/20 Jensen [1] 172/13 job [2] 58/2 77/15 jobs [1] 77/17 John [6] 10/4 34/8 126/3 128/11 135/15 177/12 joint [4] 115/16 175/8 175/12 175/14 joke [1] 197/6 JORGE [2] 1/20 5/4 judge [8] 1/10 4/25 194/6 218/3 219/14 219/24 222/19 222/25 judgment [1] 39/23 judgments [1] 10/14 judicial [3] 221/9 221/10 221/17 July [7] 6/25 10/24 12/8 41/11 73/24 74/16 87/9 June [7] 9/4 9/4 10/24 12/8 64/17 135/20 187/13 June/July [1] 12/8 jurisdictions [1] 110/20 juror [1] 220/22 jurors [2] 5/11	jury's [1] 148/20 just [104] 5/14 5/19 6/20 9/5 11/18 11/25 14/14 17/11 23/9 24/10 27/16 28/5 29/6 30/19 32/17 33/13 33/16 34/23 35/2 36/4 36/5 39/18 42/1 45/8 45/24 50/14 53/2 53/8 56/25 57/14 58/2 59/16 70/12 71/2 73/18 75/3 77/24 79/15 81/25 82/11 85/12 95/3 98/21 102/14 106/2 111/7 111/17 112/1 112/7 112/10 118/21 119/6 121/24 122/2	K K's [9] 39/24 40/4 49/11 50/9 56/14 56/16 83/7 83/9 91/3 KASS [2] 1/21 5/2 keep [19] 55/25 56/20 75/11 82/20 93/3 101/22 102/5 102/8 109/24 110/12 133/15 134/8 134/8 176/6 178/11 190/24 190/24 199/11 218/22 keeps [1] 48/15 kept [7] 43/7 64/22 82/18 82/19 82/20 100/4 134/22 key [8] 11/20

K	150/18 150/21	173/23 173/23
USCA11 Case: 22-11150 Document: 53-11 Date Filed: 11/30/22 Page: 248 of 254	151/10 151/22	175/10 175/20
key ... [7] 97/22	152/9 152/14	180/7 180/7 194/12
150/20 152/9	153/13 155/4	194/22 195/8
152/12 194/4	158/12 163/25	196/15 205/20
208/15 214/20	164/12 164/14	209/4 221/18 222/8
keys [5] 13/1	164/24 166/25	knowing [1] 188/4
130/14 130/25	168/16 173/3	knowledge [2]
141/16 141/17	174/13 174/22	110/17 209/7
kidding [1] 108/18	177/15 177/16	known [5] 35/11
kids [2] 198/25	179/15 182/14	59/5 73/16 212/14
199/6	182/24 209/21	213/18
killling [1] 48/24	214/13 217/24	KPMG [4] 16/25
kilt [1] 37/3	217/25 218/15	17/1 42/17 50/19
kind [4] 52/7	219/11	Kraken [1] 36/8
208/13 209/2 214/3	Kleiman's [2]	KYLE [2] 1/13 4/14
KLEIMAN [106] 1/3	30/16 141/15	
1/4 4/7 4/20 6/22	Kleimans [1] 13/19	L
6/23 11/24 12/2	knew [1] 18/6	label [4] 146/3
12/22 12/23 13/17	know [75] 13/12	153/18 155/1 156/7
17/23 17/25 18/7	15/19 17/13 24/19	lack [1] 122/23
18/8 18/12 23/5	26/13 26/15 26/23	ladies [8] 6/3
23/18 24/9 24/15	28/14 28/20 31/12	60/4 61/7 111/4
26/2 27/7 27/10	37/2 37/20 39/18	112/15 163/9
27/13 27/14 27/20	41/13 41/13 48/19	201/23 220/13
28/4 28/15 28/25	48/19 50/10 57/17	LAGOS [2] 1/17
29/17 30/6 30/6	63/11 64/5 79/21	4/16
30/12 30/14 30/24	80/21 82/23 84/18	laid [5] 14/24
32/16 34/3 34/10	84/18 92/14 94/18	33/15 156/10
34/20 48/1 48/5	106/5 106/11	158/15 162/11
48/5 74/8 75/13	106/12 110/17	lake [1] 91/24
75/22 78/16 79/1	110/22 110/25	language [3] 60/10
79/14 82/14 98/12	114/24 118/21	60/19 61/2
99/8 116/9 118/14	125/9 125/20	languages [1] 47/1
126/7 126/15 127/5	126/23 126/23	laptop [2] 180/20
127/6 127/19 140/8	127/10 127/20	180/21
140/11 142/4	134/7 136/4 143/18	large [3] 37/18
142/20 145/8	143/21 145/24	49/24 50/3
145/16 145/18	147/24 147/25	larger [2] 35/1
145/23 146/8 147/8	153/9 160/7 160/10	179/14
147/10 147/15	160/11 160/16	largest [1] 77/1
147/23 148/1 148/8	160/17 160/21	last [14] 5/16
148/16 149/8	160/23 160/25	6/15 20/22 21/19
149/19 149/24	161/1 161/4 170/5	25/8 47/3 60/7

L	141/15 177/13	124/4 138/3 155/5
last... [7] 108/10	187/12	155/15 155/24
109/1 173/2 182/22	lawyers [16] 16/23	159/19 161/18
193/8 207/1 221/9	37/3 37/17 39/10	161/19 161/21
Laszlo [2] 180/11	44/10 48/22 91/2	166/24 185/2
180/14	91/18 136/14	185/14 193/18
late [2] 30/14	151/12 153/20	199/9 210/19
98/5	165/8 165/8 186/1	210/22 214/4 217/9
later [19] 17/14	186/24 197/7	218/21 218/24
27/1 49/24 62/20	lay [12] 33/12	left-hand [13]
64/2 64/6 67/8	116/13 116/15	23/1 35/15 40/11
70/17 85/21 90/7	116/16 129/20	47/16 72/11 72/12
99/24 106/3 170/17	133/18 143/11	155/15 155/24
174/18 179/10	152/25 156/18	159/19 161/18
205/25 206/10	157/8 192/16	161/19 166/24
210/7 212/15	197/22	185/14
laughing [2] 75/2	leads [1] 74/17	legal [13] 12/12
75/9	leaked [1] 146/9	15/20 15/22 15/25
launch [2] 89/10	leap [3] 81/2	30/21 31/6 33/20
177/8	81/15 82/3	70/5 74/17 82/8
launched [3] 117/7	Learn [1] 37/5	82/12 92/23 188/5
179/11 179/12	learned [2] 220/20	legally [2] 92/25
launching [2]	220/21	197/9
89/16 89/25	learning [2] 55/14	legitimate [6]
laundering [1]	56/20	126/14 126/19
117/9	learnt [1] 37/1	127/18 145/16
lavalier [1] 112/7	lease [1] 83/14	147/8 147/23
law [12] 37/18	least [3] 138/25	Leon [1] 1/22
37/19 37/20 37/21	179/16 221/23	less [3] 51/11
45/20 60/12 87/20	leave [2] 22/25	216/16 216/17
89/11 91/18 94/13	31/10	let [11] 6/9 7/23
199/12 205/21	leaves [2] 116/23	16/7 34/6 78/16
Lawrence [1] 104/6	118/12	79/16 110/25 158/8
lawsuit [4] 6/25	leaving [2] 83/24	167/11 191/10
88/20 92/21 117/13	97/9	192/21
lawsuits [3] 34/3	led [1] 76/13	let's [61] 4/4
34/11 118/12	Lee [3] 50/18 51/2	5/25 9/7 9/24
lawyer [17] 10/5	52/8	17/20 28/19 28/20
15/15 33/6 36/23	left [36] 6/15	31/11 31/11 31/13
37/13 38/6 40/12	23/1 31/11 32/3	32/11 32/25 33/8
81/3 82/1 96/20	35/12 35/15 38/17	33/18 37/8 38/18
116/25 127/24	40/11 47/16 48/2	38/19 40/8 46/4
128/24 136/5	48/3 72/11 72/12	49/3 52/4 57/2
	88/18 111/9 113/24	60/4 61/5 67/13

L	64/21 67/25 113/2	180/6 181/19
USCA11 Case: 22-11150 Document: 58-11 Date Filed: 11/30/22 Page: 250 of 254	lie [5] 9/5 34/11	182/12 188/15
let's... [36]	37/23 38/6 40/12	190/22 194/22
71/19 72/11 72/13	life [6] 45/21	196/16 196/17
72/14 75/3 88/20	56/5 172/12 172/15	196/20 199/13
91/24 95/14 96/25	176/12 192/2	199/16 200/23
100/15 100/21	life's [1] 188/3	206/18 208/13
111/4 112/12	like [119] 8/21	208/19 210/3
129/20 131/14	11/9 13/8 13/11	211/14 213/12
133/20 139/16	14/1 15/16 18/3	220/10 222/3
143/11 143/19	20/8 20/16 20/19	222/10 222/14
159/13 162/16	20/22 21/4 22/23	liked [1] 79/5
162/20 163/6	25/1 28/8 29/1	likely [1] 198/6
165/20 182/19	36/3 36/8 38/14	Limited [6] 95/17
184/12 193/23	39/19 41/16 42/19	96/9 97/7 125/7
200/17 202/19	43/11 43/12 43/16	128/23 184/18
207/13 210/21	43/17 45/11 47/13	Limited's [1]
210/22 211/6 211/7	48/12 48/15 48/19	97/19
212/8 218/22	48/24 49/13 51/21	line [28] 7/5
lets [1] 214/5	53/7 53/8 54/16	21/19 24/13 40/20
letter [11] 9/12	55/5 55/24 56/4	45/5 45/13 56/6
18/16 18/17 20/10	56/5 57/1 59/5	56/6 105/21 105/22
29/19 61/17 153/11	59/14 67/7 71/22	107/8 107/21
164/24 184/5 185/8	74/16 74/20 75/10	130/19 130/21
185/11	79/8 79/10 82/21	130/22 130/24
letterhead [1]	84/16 86/17 90/7	130/24 130/25
35/10	90/16 90/18 93/11	135/2 135/3 183/13
letters [1] 116/25	93/12 106/2 106/6	200/21 201/8
letting [1] 188/12	109/16 113/6	212/12 212/14
level [2] 17/2	118/12 121/5 121/8	213/17 214/7
180/5	121/12 121/13	217/12
levels [2] 90/19	122/19 123/13	lines [18] 42/15
90/19	124/6 124/12 126/4	47/1 47/2 48/4
liabilities [1]	133/18 134/6 135/3	48/6 48/7 51/7
185/19	135/24 140/9	53/10 56/21 56/22
Liberty [1] 196/20	141/17 146/21	56/24 58/20 73/9
license [5] 36/1	150/19 151/24	73/21 105/17 179/4
46/25 89/13 109/13	153/23 154/20	212/15 213/7
117/24	157/13 159/5	links [2] 192/14
licensed [5] 64/23	164/13 166/23	206/16
89/15 100/8 117/11	167/22 170/18	liquidate [1]
118/2	172/1 174/24 176/7	49/15
licenses [1] 49/21	176/24 177/1	liquidation [9]
licensing [3]	177/14 178/14	83/11 84/15 84/16

L	187/18	148/20 152/16
liquidation... [6]	London [2] 199/21	159/1 159/24 169/3
85/10 85/11 85/14	199/24	173/16 210/17
86/2 86/22 87/25	long [7] 8/13 13/6	212/5 215/6
list [10] 5/15	13/11 76/14 82/20	looks [18] 21/4
16/5 105/4 193/8	213/12 216/14	21/4 25/1 126/4
193/15 194/5 195/7	longer [7] 76/18	140/9 140/22
195/12 195/15	84/1 91/11 92/5	141/17 147/16
197/20	99/13 111/8 180/3	148/9 150/19 164/1
listed [4] 59/4	look [39] 18/23	164/13 167/22
75/11 75/12 119/16	25/18 33/18 38/14	177/14 210/23
lists [2] 100/17	43/1 55/5 62/7	212/4 213/12 214/3
138/1	89/22 91/24 110/10	loop [1] 10/8
literally [1]	121/8 121/12	loot [2] 80/6
187/25	121/14 122/19	80/17
litigation [1]	123/13 124/6	looted [2] 78/4
164/25	124/12 145/9	78/17
little [20] 7/24	145/25 151/24	looting [1] 78/21
19/10 35/23 48/14	155/10 155/13	lose [2] 51/25
50/1 53/9 85/18	157/12 157/13	188/11
85/19 107/4 136/13	165/8 167/3 173/10	lost [4] 12/14
136/16 136/23	175/10 175/24	36/1 40/16 40/19
181/8 181/12 189/5	178/22 179/19	lot [28] 5/19
189/8 191/18	180/5 180/17	13/12 43/11 44/2
204/21 216/16	186/15 192/21	51/22 54/12 54/15
216/17	208/22 210/22	55/13 55/13 56/18
live [5] 196/3	212/12 214/7	56/19 83/20 83/21
199/17 199/19	looked [20] 10/2	83/24 83/25 84/22
203/6 203/7	10/4 10/22 10/22	85/7 92/19 108/9
lived [1] 212/22	11/17 13/4 18/17	108/13 116/23
living [1] 199/22	51/22 116/2 119/16	133/17 136/2
LLC [1] 1/4	134/20 168/15	168/19 168/22
LLP [2] 1/12 1/19	176/14 182/6	180/3 208/22
loan [9] 62/7	182/12 183/5	208/23
62/11 66/4 71/4	196/19 208/8	lots [2] 192/1
71/6 82/8 131/16	208/23 212/11	192/1
134/3 134/4	looking [28] 7/18	louder [1] 204/21
loaned [1] 93/10	10/20 13/1 23/4	Louis [3] 11/20
loans [1] 200/5	25/22 26/18 40/12	11/24 12/2
local [1] 221/14	40/20 47/25 48/2	love [1] 210/3
located [2] 213/5	49/11 51/13 71/14	low [1] 108/19
213/6	86/17 100/18	low-end [1] 108/19
locked [2] 83/14	109/21 109/22	LTD [8] 72/7 87/11
	113/2 118/23	87/16 124/7 185/4

L	35/22 105/4 106/7	181/25 212/13
LTD... [3] 185/13	major [1] 29/7	margin [1] 49/10
195/10 195/11	majority [2] 77/8	mark [3] 56/5
lunch [5] 111/1	84/9	115/13 140/21
111/5 112/3 112/17	make [27] 19/15	marker [1] 207/16
112/23	23/7 36/16 38/14	market [10] 26/21
Lynn [1] 192/10	44/2 49/13 57/15	45/14 45/16 50/6
M	64/10 78/9 80/21	76/24 141/9 197/25
M-A-T-T-H-E-W [1]	84/19 100/10	198/4 198/8 205/7
202/23	100/11 110/16	marketplace [4]
MacGregor [4]	112/1 113/25	205/9 205/10 206/4
59/24 65/23 105/10	120/23 122/2	206/16
134/1	154/17 169/21	massive [1] 91/18
machine [12] 17/7	170/18 174/24	master [2] 105/11
55/14 56/20 139/13	186/3 191/25	204/1
139/13 147/25	194/21 200/10	master's [1]
165/25 165/25	220/15	108/15
174/19 180/10	maker [1] 84/25	match [1] 161/22
180/19 224/8	makes [1] 45/21	material [7] 96/12
machines [7] 55/5	making [7] 10/7	97/12 97/23 146/6
55/7 153/19 174/16	13/22 79/22 80/22	153/21 153/22
174/17 178/7 178/9	145/1 175/1 187/18	165/6
mad [1] 82/4	man [8] 18/5 29/3	mathematics [1]
Madam [1] 181/2	29/8 37/19 56/24	55/16
made [19] 11/24	80/3 87/7 199/21	matter [4] 108/23
17/7 18/1 43/9	manage [1] 178/21	156/11 195/3
48/17 83/15 83/23	managed [1] 54/15	203/14
84/20 85/9 136/7	management [3]	MATTHEW [6] 2/6
161/10 161/25	53/5 53/9 106/7	86/7 202/9 202/14
183/11 186/9	manager [1] 106/21	202/22 203/7
192/13 196/7	manipulation [1]	Matthews [33]
196/14 197/14	90/19	41/21 58/23 58/25
214/8	many [13] 13/8	59/2 61/15 62/3
Magic [1] 83/2	43/25 93/8 93/8	62/4 65/24 69/11
magistrate [1]	103/14 134/25	71/23 74/24 81/11
194/6	136/12 172/12	81/12 81/24 82/13
magnificent [1]	180/8 180/18	83/7 85/25 87/7
79/7	180/22 206/24	88/7 99/14 99/19
Mai [1] 80/8	207/2	102/19 103/1
mainly [1] 204/9	March [14] 18/14	104/14 123/23
maintain [2] 105/7	18/16 20/5 20/11	129/9 129/11
105/11	22/22 23/5 58/19	130/16 132/2
maintained [3]	73/8 73/20 105/16	132/18 133/4 137/5
	105/20 179/16	142/3

M	59/12 61/1 63/10	26/22 56/16 82/15
USCA11 Case: 22-11150 Document: 53-11 Date Filed: 11/30/22 Page: 253 of 254	76/17 77/2 77/4	101/12 110/16
Matthews [2] 67/9	77/4 78/7 78/16	142/5 150/23
88/24	79/4 79/7 79/14	153/18 155/16
Maximum [1] 114/6	79/20 83/18 83/24	160/13 176/6
may [19] 26/19	84/5 84/6 84/13	179/20 196/24
55/6 96/13 96/22	84/22 85/19 86/3	meant [3] 88/15
97/13 98/25 115/23	88/18 90/2 92/12	178/22 180/3
152/23 155/19	92/13 92/14 93/10	meantime [1] 145/1
159/7 170/7 179/12	99/15 101/1 102/20	media [1] 29/5
183/21 201/3 201/4	104/18 108/9	meet [1] 41/17
201/5 202/5 203/1	110/25 117/11	meeting [8] 10/10
207/15	117/11 118/13	40/10 58/25 62/4
Mayaka [1] 184/1	122/11 129/24	84/4 84/5 99/10
maybe [6] 12/12	131/16 134/7	123/24
24/1 26/23 79/17	136/15 136/15	meetings [2] 59/25
111/10 150/3	139/12 153/6	176/22
McCabe [1] 44/10	156/24 158/8	member [3] 79/3
MCGOVERN [7] 1/20	161/16 167/11	84/23 203/19
4/24 111/20 112/9	170/3 172/12	members [2] 102/25
133/16 158/8 163/4	172/14 174/19	146/10
McGovern's [1]	175/25 178/13	mention [4] 56/1
171/21	182/3 186/20	73/5 103/1 133/7
McKenzie [9] 91/14	187/15 187/25	mentioned [15]
91/15 91/17 92/4	188/4 188/9 188/12	42/1 71/2 73/2
94/13 104/6 113/8	191/22 191/25	73/12 83/13 127/25
113/21 114/19	192/21 196/14	128/12 168/16
McKenzie's [1]	197/8 199/6 206/20	173/15 186/14
94/24	214/5	186/16 186/17
McMaster [1] 10/6	mean [28] 9/19	212/18 215/12
me [110] 6/9 7/23	13/6 13/25 15/21	224/9
9/9 12/10 13/13	26/5 26/21 26/25	mentioning [1]
13/16 14/8 15/11	29/1 36/1 45/17	55/25
16/7 16/21 16/22	48/8 67/4 79/2	mere [2] 156/14
18/2 19/3 19/22	80/11 82/21 90/2	156/17
20/5 23/1 25/5	92/19 101/11	merely [1] 7/9
25/8 28/6 28/8	104/22 127/10	message [12] 6/24
28/8 29/2 29/9	129/12 136/14	32/16 152/9 153/13
32/18 32/22 33/16	139/12 175/7	166/25 167/2
34/4 34/8 37/6	178/13 186/3 186/7	169/13 173/21
38/15 38/15 38/17	195/1	215/6 215/6 217/23
45/15 46/10 47/13	meaning [3] 91/9	217/25
48/11 48/12 48/17	118/1 189/2	messages [4] 126/6
57/12 58/16 59/11	means [14] 8/15	126/14 168/22

M	169/24 171/15	182/3 182/7
messages... [1]	171/16 186/19	minimize [2]
215/5	186/20	108/2
messed [1] 45/19	Miller [2] 28/23	minimum [1] 49/8
messy [1] 196/5	135/15	mining [17] 176/10
MESTRE [3] 1/19	million [64] 8/4	176/15 176/16
1/20 5/4	8/6 8/8 8/10 8/11	176/18 178/3 178/3
met [5] 37/2 58/23	8/12 12/12 19/16	178/9 179/15
172/10 176/23	19/20 21/1 21/2	180/11 180/11
176/24	21/5 21/6 21/9	180/15 180/16
metadata [9]	21/11 21/14 21/15	180/19 180/20
207/10 208/1 208/1	21/17 24/5 24/7	181/25 182/2 182/6
208/2 210/24 212/5	25/15 25/20 25/22	minus [1] 19/12
212/7 212/8 212/12	25/25 25/25 26/7	minute [11] 60/4
Metanet [1] 56/6	27/6 27/8 43/21	60/13 65/7 88/18
Metaverse [1] 56/7	48/6 48/7 48/15	144/21 152/24
methodologies [1]	49/17 49/18 53/10	162/18 162/20
109/18	62/8 62/12 66/11	168/9 171/15
methodology [1]	66/14 67/21 67/24	212/15
207/8	68/20 68/23 68/24	minutes [8] 111/2
methods [1] 207/6	69/1 74/21 76/21	111/9 111/10
Miami [7] 1/14	76/22 76/24 77/2	123/24 135/18
1/18 1/24 1/25	79/19 79/21 79/22	219/7 219/19
224/15 224/18	80/1 80/23 82/5	220/10
224/18	85/8 108/12 134/5	Mischaracterization
mic [1] 163/3	156/11 197/5	[1] 40/1
MICHAEL [3] 1/21	199/22 210/5	mischaracterizing
5/5 140/23	217/10	[2] 40/5 45/15
microloans [1]	millions [3] 85/5	miscommunication
200/4	85/5 176/12	[1] 150/3
micropayments [1]	mind [2] 142/14	Misfit [1] 124/7
177/4	208/25	misinforming [1]
microphone [1]	mine [15] 39/11	8/17
202/25	155/18 160/15	misinterpreting [1]
Microsoft [4]	175/7 176/18	21/12
176/20 176/21	178/20 180/4	misrepresentation
176/25 177/6	180/20 182/8	[1] 56/18
middle [4] 75/25	193/16 194/9	misrepresenting [3]
149/11 159/24	194/11 194/13	75/11 117/14
175/4	195/15 195/16	118/11
might [11] 27/2	mined [10] 174/22	missing [4] 17/5
78/12 78/13 86/2	176/1 176/3 176/17	64/22 77/7 152/2
110/25 133/16	176/17 177/24	misstated [1]
	178/24 179/21	125/23